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INTERIM REPORT CLOSURE OF BURN-ZOL INCINERATOR

PREPARED FOR:

UNITED TECHNOLOGIES CORPORATION PRATT & WHITNEY 400 MAIN STREET EAST HARTFORD, CT 06108 EPA ID NO. CTD 990672081

PREPARED BY:

SUGATO MITRA

SCI-TECH, INC. 360 MAIN STREET MIDDLETOWN, CT 06457

SCI-TECH PROJECT NUMBER 90021

JUNE 1990



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June 13, 1990

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Mr. George Dews
Senior Sanitary Engineer
Waste Management Bureau
Department of Environmental Protection
18-20 Trinity Street - 2nd Floor
Hartford, CT 06106

Mr. Stephen Yee Environmental Engineer Waste Management Division US EPA 90 Canal Street - 3rd Floor Boston, MA 02114

Re:

Interim Report - Closure of the Burn-Zol Incinerator UTC - Pratt & Whitney East Hartford, CT EPA ID #CTD990672081

Dear Sirs:

United Technologies - Pratt & Whitney (P&W) is pleased to submit an interim report for closure of the Burn-Zol Hazardous Waste Incinerator. This preliminary report has been prepared to support our request for extension to the closure time period as stated in our March 7, 1990 letter correspondence.

The report summarizes the major elements of the approved closure plan, the closure activities executed in accordance with the plan, any deviations from the plan and areas where additional closure tasks are necessary. We are confident that the remaining tasks can be executed within the time period requested in the above referenced letter.

Your time in review of the enclosed report is greatly appreciated. Should you have any questions or comments please contact Mr. Scott Singer at (203) 565-3514.

Sincerely,

R. C. Weiss

Director, Facilities & Services

RCW/SLS/ljs

s-s5x

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1.0 <u>INTRODUCTION</u>

Technologies-Pratt & Whitney (P&W) owns and operates the Concentrated Waste Treatment Plant (CWTP), a hazardous waste treatment and storage facility, located at the P&W East Hartford plant. A Burn-Zol hazardous waste incinerator, which was part of the CWTP, is being closed per the closure plan, approved on September 11, 1989 by both the Connecticut Environmental Protection (DEP) and the United States of Environmental Protection Agency (EPA), Region I. International Technology Corporation (IT) of Monroeville, PA., was contracted to carry out the closure Sampling, as required by the approved closure plan, was activities. performed by either IT or P&W personnel. All samples collected during closure were analyzed at Connecticut certified Averill Environmental Laboratory, Inc., (Averill) of Plainville, CT. The analytical data were reviewed and validated by Fred C. Hart Associates, Inc., (Hart) of Albany, NY.

The analytical data for samples collected at the end of initial closure activities indicate that two of the waste feed line rinsates have not fully met the closure criteria. Because of this, P&W has requested an extension of the closure period from both DEP and EPA, Region I to allow for additional closure activities. This report describes the closure activities performed to date. This report also contains the specific submittals, which constitute a closure certification. These are discussed in sub-Section 5.4.

2.0 PROJECT DESCRIPTION

Closure of the incinerator is considered to be a partial closure of the overall P&W East Hartford hazardous waste facility. This section identifies the equipment and the ancillary facilities subject to closure and summarizes the closure plan.

2.1 System Description

The approved closure plan authorizes P&W to close the following equipment and facilities in the CWTP.

- 1. Combustion Chamber
- 2. Exhaust Stacks (2)
- 3. Waste Heat Boiler
- 4. Air Pollution Control Equipment
- 5. Interconnecting breaching and piping
- 6. Cyanide feed line
- 7. Blended oil feed lines(2)
- 8. Concrete Pad for combustion chamber
- 9. Concrete Pit of air pollution control equipment
- 10. Ceiling above the equipment to be closed

The combustion chamber and the exhaust stacks were located outdoors. The remainder of the incinerator train was located indoors. The cyanide and the blended oil waste feed lines are located underground. A site plan, equipment layouts and a flow diagram of the incinerator train and the waste feeds lines are included in Appendix A. Photographs of the incinerator train are included in Appendix B.

2.2 Closure Plan Summary

The final closure plan dated July 28, 1989 as amended on August 17, 1989 was approved on September 11, 1989. The following are the main features of the approved closure plan.

2.2.1 Disposal and Decontamination

- a. Any ash from the incinerator, residue from the waste heat boiler, and packing from the scrubber will be removed, containerized, and treated as hazardous waste.
- b. Waste feed lines will be decontaminated by flushing until they meet the closure criteria and then they will be abandoned in place. Any rinsate generated from flushing of the lines will be treated as hazardous waste.
- c. The entire incinerator train including the air pollution control equipment will be dismantled, cut to shippable sizes and disposed of at a RCRA permitted secure landfill.
- d. The concrete slab will be shotblasted or scarified. Any concrete residue will be treated as hazardous waste.
- e. The concrete pit for the air pollution control equipment will be hydroblasted. Any rinsate generated will be treated as hazardous waste.
- f. The ceiling in the building will be washed by applying a biodegradable cleaning solution with a hand applicator. Any rinsate generated will be treated as hazardous waste.
- g. All hand tools that may have come in contact with the incinerator train will be decontaminated by washing. Any rinsate generated will be treated as hazardous waste.

2.2.2 Sampling

- a. The final flush from each waste feed line will be sampled.
- b. Chip samples will be taken from the concrete slab and the concrete pit.
- c. Wipe samples will be collected from the ceiling.

2.2.3 Analysis

- a. All samples will be analyzed for presence of the constituents identified in Table 2 of the final closure plan (Appendix C).
- b. Concrete chip samples will be analyzed for EP toxicity.

2.2.4 Closure Criteria

- a. Appendix C constituent levels in the rinsate must be either below the levels shown in Table 1 of Appendix D or equal to or below the levels in the influent water sample collected prior to flushing.
- b. The concrete chip samples must show Appendix C constituent levels either equal to, or below the background levels, or below the levels shown in Table 2 of Appendix D and below the EP Toxicity levels shown in Table 1 of 40 CFR 261.24 in effect on the date of closure approval (September 11, 1989).
- c. Appendix C constituent levels in the ceiling wipe samples must be equal to or below the background levels.

3.0 CLOSURE ACTIVITIES

The activities associated with the closure of the Burn-Zol hazardous waste incinerator consist of dismantling, decontamination, disposal and sampling. The logs of daily activities of the IT crew are included in Appendix E. Photographs showing progress of the closure activities are included in Appendix F.

During the closure activities the health and safety plan included in Appendix G was followed. A safety meeting was conducted prior to start of work each day. The lists of attendees and topics covered are included in Appendix H.

3.1 <u>Dismantling</u>

All major components of the incinerator train and interconnecting breaching and piping were dismantled. Refractory from all refractory lined items was removed by hand or with an electric chipping hammer. The shells of all components and the interconnecting breaching and piping were cut into shippable pieces. The concrete pad with footing was excavated and broken up. Debris from dismantling and small equipment pieces were initially staged on plastic sheeting with plastic covers and then placed in covered roll-off containers for disposal. The large equipment pieces were similarly staged and then put on flat bed trailer for disposal. The following is a list of the components dismantled:

- 1. Combustion Chamber
- 2. Exhaust Stacks
- 3. Waste Heat Boiler
- 4. Air Pollution Control Equipment
- 5. Interconnecting Breaching and Piping
- 6. Concrete Pad for Combustion Chamber

3.2 Decontamination

The items decontaminated and the decontamination procedures are noted below.

1. Blended Oil Feed Line (WFL1):

The line was flushed in sequence tap water, Citrikleen solution (30%) (a biodegradable detergent) and tap water. As the line was not clean, it was then flushed with steam for 7.5 hours followed by Citrikleen solution, and tap water in sequence. The line was capped at both ends.

2. Blended Oil Feed Line (WFL2):

The line was found plugged. It was flushed with steam for 6 hours. It was then flushed in sequence with tap water, Citrikleen solution and tap water similar to WFL1. It was then flushed again with steam for six hours and Citrikleen solution and tap water in sequence. The line was capped at both ends.

3. Cyanide Feed Line (WFL3):

The cyanide line decontamination was similar to WFL1, except a 25% sodium hydroxide solution was used instead of Citrikleen solution during the initial cleaning. The line was capped at both ends.

4. Concrete Pit:

The concrete pit was decontaminated by steam cleaning.

5. Ceiling:

The ceiling was hand sprayed with Citrikleen solution and wiped with disposable lint-free cloth.

6. Tools:

The tools used in closure were steam cleaned.

Rinsates from all decontamination operation were collected in 55 gallon drums.

3.3 <u>Disposal</u>

The types of waste materials and disposal methods from this closure are noted below. For disposal purposes, the waste materials were treated as hazardous waste.

1. Debris and Small Equipment Pieces:

These were put in four roll-off containers which were transported off-site by licensed hazardous waste transporters to the RCRA permitted secure landfill operated by Chemical Waste Management, Inc., at Emelle, Alabama under the following hazardous waste manifest numbers:

CWMA 476051 CWMA 476052 CWMA 476055 CWMA 476056

The first two containers were shipped on December 1, 1989 and the last two on December 8, 1989. Copies of manifests, receipts and disposal certificates are included in Appendices I, J, and K, respectively.

2. Large Equipment Pieces:

These were put on a flat bed trailer and shipped to the same disposal facility as above by a licensed hazardous waste transporter under hazardous waste manifest number CWMA 476053 on December 4, 1989. Copies of manifest, receipt and disposal certificate are included in Appendices I, J, and K, respectively.

3. Rinsates:

The collected rinsates were transferred from 55 gallon drums to bulk tanks containing similar and compatible liquid hazardous waste streams. These bulk waste streams are routinely sent off site for disposal and/or treatment at properly licensed disposal and/or treatment facilities.

3.4 Sampling

The following samples were collected per the approved closure plan.

- 1. Final rinsate from WFL1
- 2. Final rinsate from WFL2
- 3. Final rinsate from WFL3
- 4. Influent tap water
- 5. Concrete chip samples from the pit
- 6. Wipe samples from the decontaminated ceiling
- 7. Wipe samples from background ceiling area

The sampling methodology and the analytical results are discussed in more detail in Section 4.

4.0 SAMPLING AND ANALYSIS

During and at the end of closure activities various samples were collected to assess the completeness of these activities. The samples were collected by either Mr. Jacques Hill of IT or Mr. Scott Singer of P&W. The collected samples were sent under full chain-of-custody to Averill for analysis. Sampling logs and raw analytical data are included in Appendices L and M respectively. The analytical results were reviewed and validated by Hart. The validation report is included in Appendix N. Only the final sampling program and the validated data from the analyses of the final samples are presented in this section.

4.1 Waste Feed Lines

The second and final round of waste feed line sampling was performed on December 7, 1989. IT coordinated sampling activities and the first sample collected was an influent tap water sample from the wax building. The water was activated at 1150 hours and allowed to flow through a new length of garden hose for 5 minutes prior to sample collection. The sample was collected directly from the end of the garden hose.

Waste feed line flushing operations were initiated at 1155 hours. The flushing procedures were modified by flushing each waste feed line with Citrikleen solution, and tap water in sequence. An average of 25 gallons of rinsate was collected from each line prior to sample collection.

The samples were collected directly into the laboratory bottles from a new length of garden hose on each line. For this round of sample collection, the samples were labelled WFL-1A, WFL-2A, WFL-3A for each respective feed line. In addition, a blind duplicate sample was collected from waste feed line WFL2 and was labelled WFL-4A.

The QA/QC samples included a field blank collected on November 15, 1989 during the initial round of sampling and a trip blank. The field blank was prepared on November 15, 1989 at 1540 hours by pouring deionized water into sample containers. The trip blank was prepared by Averill and accompanied the sample bottles from and to Averill.

Following sample collection, all sample jars were labelled, transferred to an iced cooler and hand delivered under full chain of custody to Averill for analysis.

The validated analytical results are presented in Table 4-1. The results indicate that the levels of Appendix C constituents in rinsate from the cyanide feed line (Sample WFL-3A) were below the target levels. Results from both blended fuel lines (Samples WFL-1A, WFL-2A and WFL-4A) indicate that levels of all inorganic Appendix C constituents were below the target levels.

TABLE 4-1
WASTE FEED LINE SAMPLE ANALYSIS (mg/l)

	Target		_			
Parameter	Clean <u>Level</u>	Influent	WFL #1A	AMPLE NUMBE WFL #2A	WFL #3A	WFL #4A*
<u>Metals</u>						
Arsenic	0.05	<0.01	<0.01	<0.01	<0.01	<0.01
Barium	1.0	<0.01	0.01	<0.01	0.01	<0.01
Cadmium	0.01	<0.006	<0.006	<0.006	<0.006	<0.006
Chromium	0.05	<0.05	<0.05	<0.05	<0.05	<0.05
Chromium VI	• •	<0.01	<0.01	<0.1	<0.01	<0.01
Copper	1.0	0.21	0.21	0.1	0.09	0.09
Lead	0.05	<0.1	<0.1	<0.1	<0.01	<0.01
Mercury	0.002	<0.001	<0.001	<0.001	<0.001	<0.001
Nickel		<0.02	<0.02	<0.02	<0.02	<0.02
Selenium	0.01	<0.01	<0.01	<0.01	<0.01	<0.01
Silver	0.05	<0.01	<0.01	<0.01	<0.01	<0.01
Cyanide						
Total	0.2	<0.005	<0.005	0.12	<0.005	0.21
Volatile Organics						
Methylene Chloride	0.025	<0.005	0.058	<0.01	<0.005	<0.01
1,1 Dichloroethene	0.007	<0.005	<0.005	<0.01	<0.005	<0.01
1,1,1 Trichloroethane	0.2	<0.005	0.012	0.022	<0.005	0.016
Carbon Tetrachloride	0.005	<0.005	<0.005	<0.01	<0.005	<0.01
Trichloroethene	0.005	<0.005	0.122	<0.01	<0.005	<0.01
Tetrachioroethylene	0.02	<0.005	0.048	3.4	<0.005	3.7

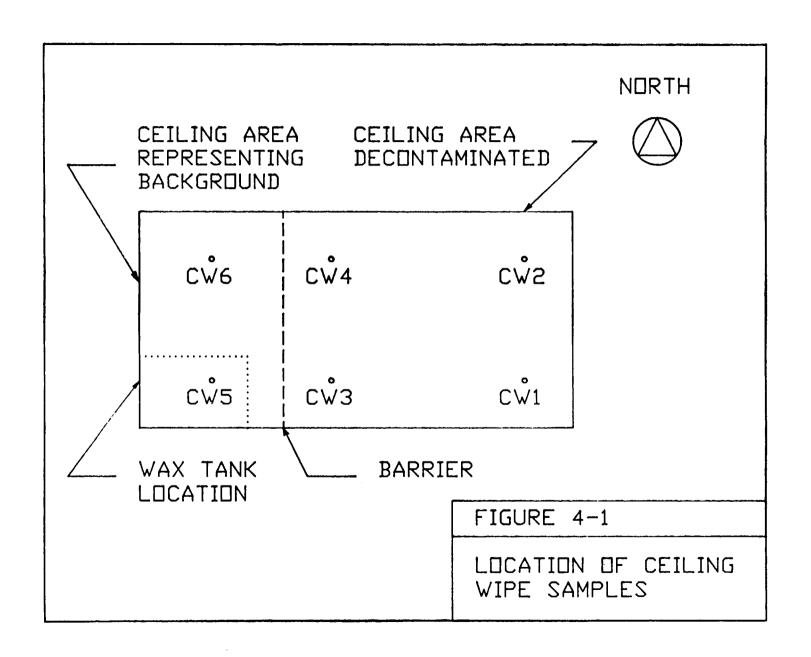
^{*} duplicate of WFL #2A

4.2 Ceiling

A total of six wipe samples were collected on December 7, 1989. Four of the wipe samples (CW-1, CW-2, CW-3, CW-4) were collected from an area of the ceiling which underwent decontamination. The remaining two samples (CW-5, CW-6) were collected from outside the decontamination zone to represent background conditions. Figure 4.1 shows the layout of the sample locations.

Sampling methodology followed the procedures per the approved closure plan. Vinyl acetate templates were used at each location to outline the sample area. The template dimensions measured 5 X 20 cm thereby totalling 100cm^2 . Templates were affixed to the ceiling using small magnets. Sample wipes were transferred directly into the sample jars following sample collection, and the sampling team changed gloves at each sample location to ensure sample integrity.

At a given sample location, a total of three templates were positioned side by side following the contour of the corrugated ceiling. The first template was sampled for Appendix C organic constituents, the second for cyanide and the third for Appendix C metals. Methanol, dilute sodium hydroxide solution, and dilute nitric acid solution were the respective extraction solvents. During VOCs sampling it was observed that the methanol was stripping the paint off the ceiling. No such stripping was observed during cyanide or metals sampling.



Specific sampling procedures for each set of parameters consisted of performing three wipes. The first two wipes were performed wet by moistening the wipe with the appropriate extraction solvent. The third wipe was performed dry to absorb any residual extraction solvent from the sample area.

QA/QC sampling consisted of one field blank collected at location CW-1. This sample was prepared in the same manner as the other samples except no wiping of the ceiling was performed.

Following sample collection, all sample jars were labelled, transferred to an ice cooler and hand delivered under full chain of custody to Averill for analysis.

The validated analytical results are presented in Table 4-2. The results indicate that the Appendix C constituent levels shown by samples CW-1, CW-2, CW-3 and CW-4 match the corresponding constituent levels shown by background samples CW-5 and CW-6. The only exception was the 1,1 dichloroethene level in sample CW-2. As there were not any incinerator train components or waste feed lines near the location where sample CW-2 was collected, this level can not be attributed to the equipment undergoing closure. Also, this reported level is inconsistent with non-detectable levels reported for other locations; therefore, the value is considered an analytical anomaly and was rejected.

TABLE 4-2
CEILING WIPE SAMPLE ANALYSIS (micro g/l00cm2)

	SAMPLE NUMBERS						
Parameter	<u>CW-1</u>	<u>CW-2</u>	<u>CW-3</u>	CW-4	<u>cw-5</u> *	<u>cu-6</u> *	
Metals							
Arsenic	<47.5	<47.5	<47.5	<47.5	<47.5	<47.5	
Barium	> 14000	>14000	>14000	> 1 4 0 0 0	>14000	>14000	
Cadmium	< 45	< 45	< 45	< 45	< 45	< 45	
Chromium	< 25	<25	<25	<25	<25	< 25	
Chromium VI				• •			
Copper	< 2.5	< 2.5	< 2.5	< 2.5	< 2.5	< 2.5	
Lead	<130	<130	<130	<130	<130	< 130	
Mercury	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	< 0.05	
Nickel	< 5	< 5	< 5	< 5	< 5	< 5	
Selenium	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5	
Silver	< 2.5	< 2.5	< 2.5	< 2.5	< 2.5	< 2.5	
Cyanide							
Total	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	
Volatile Organics							
Methylene Chloride	<4.9	<4.9	<4.9	<4.9	<4.9	<4.9	
1,1 Dichloroethene	<0.05	0.14	<0.05	<0.05	<0.05	<0.05	
1,1,1 Trichloroethane	<3.3	<3.3	<3.3	<3.3	<3.3	<3.3	
Carbon Tetrachloride	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	
Trichloroethene	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	
Tetrachloroethylene	<1.05	<1.05	<1.05	<1.05	<1.05	<1.05	

^{*} background

4.3 Concrete

A total of six concrete chip samples were collected on December 7, 1989. Five of the samples were collected to assess the completeness of pit decontamination. A sixth sample was collected as a background sample. Figure 4.2 shows the sample locations.

Samples CS-1, CS-2, CS-3, CS-4, and CS-5 were collected from each wall of the pit and the floor. Wall samples were collected approximately 2.5 feet above the pit floor in the center of the wall. The floor sample was collected from the center of the floor.

The background sample CS-6 was collected in the same pit as the decontamination samples. This sample was collected immediately below the top of the pit wall near the southwest corner of the pit.

All concrete chip samples were collected by IT representative, Mr. Jacques Hill using a cleaned hand chisel and a hammer. Dislodged chips were allowed to fall on a fresh piece of polyethylene sheeting. Using a pair of new latex gloves, the sampler then collected the chips and transferred them directly into the sample jars.

Following sample collection, all sample jars were labelled, transferred to an iced cooler and hand delivered under full chain of custody to Averill for analysis.

NORTH CS1 SIDE WALL HEIGHT OF SIDE FLOOR SIDE SIDE WALL WALL OF PIT WALL SAMPLE LOCASTIONS: cs4 CS5 C25 CS1 2.5' CS2 2.5' CS3 2.5' CS4 2.5' SIDE WALL CS6 4.0' °C23 CS6 FIGURE 4-2 SCRUBBER PIT LOCATION OF CONCRETE CHIP SAMPLES

The validated analytical results for the Appendix C constituents are presented in Table 4-3 and the validated analytical results for EP Toxicity analysis are presented in Table 4-4. Mass analysis results for sample CS-5 show elevated levels of chromium and nickel which can be attributed to the sampling tool (steel chisel), which contains these metals. In general, the Appendix C constituent levels are found to match the background levels and the EP Toxicity results are below levels presented in Table 1 of 40 CFR 261.24.

TABLE 4-3

CONCRETE CHIP SAMPLE ANALYSIS (ppm)

	Target						
	Clean		····	SAMPLE NU	MBERS		
<u>Parameter</u>	<u>Level</u>	<u>cs-1</u>	<u>cs-2</u>	<u>cs-3</u>	<u>cs-4</u>	<u>cs-5</u>	<u>cs-6</u> *
Metals							
Arsenic	0.02	5.5	6.7	7.5	6.0	7.3	8.6
Barium	900	47	23	40	5.0	45	19
Cadmium	-	4.7	<1.3	<1.5	<1.3	<1.5	<1.5
Chromium	-	15	9.3	49	3.4	640	3.4
Chromium VI	90	<0.059	0.065	0.23	0.13	0.033	0.12
Copper	-	9.9	13	30	9.7	74	10
Lead	-	<2.1	<2.1	3.0	<2.1	9.8	4 . 4
Mercury	-	0.043	0.042	0.049	0.042	0.049	0.049
Nickel	300	19	8.9	5 4	<4.2	400	<4.9
Selenium	-	< .47	<0.45	<0.47	<0.51	<0.41	<0.49
Silver	5 0	<2.2	<2.2	<2.0	<2.3	3.4	<2.4
Cyanide							
Total	300	<0.48	<0.49	<0.48	<0.51	<0.49	<0.5
Volatile Organics							
Methylene Chloride	47	0.005	0.007	0.002	0.005	0.009	0.005
1,1 Dichloroethene	5.8	0.002	0.005	0.006	0.007	<0.0025	<0.0025
1,1,1 Trichloroethane	2000	0.022	0.096	0.13	0.031	<0.0025	0.018
Carbon Tetrachloride	2.7	<0.0025	<0.0025	<0.0025	<0.0025	<0.0025	<0.0025
Trichloroethene	32	0.002	<0.0025	<0.0025	<0.0025	<0.0025	<0.0025
Tetrachloroethylene	69	0.28	0.46	0.53	0.31	0.017	0.3

^{*} background

TABLE 4-4

CONCRETE CHIP SAMPLE EP TOXICITY ANALYSIS (ppm)

	EP Toxicity	SAMPLE NUMBERS					
<u>Parameter</u>	<u>Levels</u>	<u>cs-1</u>	<u>cs-2</u>	<u>cs-3</u>	<u>cs-4</u>	<u>cs-5</u>	<u>cs-6</u> *
<u>Metals</u>							
Arsenic	5	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
Barium	100	0.30	0.16	0.26	0.22	0.31	0.21
Cadmium	1	<0.03	<0.03	0.04	<0.03	<0.03	<0.03
Chromium	5	0.06	0.06	0.07	0.06	<0.05	<0.05
Chromium VI	• •						
Copper							
Lead	5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05
Mercury	0.2	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001
Nickel	• •				- -		
Selenium	1	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
Silver	5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05

^{*} background

5.0 DISCUSSION

5.1 Closure Procedures

Except as noted in sub-Section 5.2 closure activities conformed to the approved closure plan. Per the closure plan, all incinerator train components were dismantled and disposed of at a RCRA permitted secure landfill. These system components are considered properly closed.

The concrete pit and the ceiling were decontaminated according to the approved closure plan. The concrete chip samples from the pit exhibited Appendix C constituent levels similar to the background levels and did not exhibit the hazardous waste characteristic for EP Toxicity. The wipe samples from the ceiling exhibited Appendix C constituent levels similar to the background samples. Therefore, these areas can be considered properly closed as they meet the closure criteria.

5.2 <u>Deviations</u>

Due to unforeseen circumstances, certain procedures that were not included in the approved closure plan were implemented to assure proper closure. These are discussed below.

- (a) The concrete pad for the combustion chamber was not large enough to allow for adequate background sampling. Therefore, the entire pad and the footing were excavated and disposed of along with other debris at the RCRA permitted secure landfill. The concrete pad is considered properly closed.
- (b) A blended oil feed line (WFL2) was found plugged. It was flushed with steam to clear the blockage. The rinsate generated was treated as hazardous waste.

- (c) It was stated in the approved closure plan that if waste feed line WFL3 was not decontaminated after the initial cleaning, the same steps will be repeated. Initial rinsate sampling resulted in no detectable cyanide; however, several organic constituents were detected above the target clean levels. As a result, the decontamination procedure was modified by substituting a Citrikleen solution for the sodium hydroxide solution during the second round of line flushing. The validated analytical results from the final round of sampling indicated that all Appendix C constituent levels were below the target level. The cyanide feed line is considered closed properly.
- (d) Decontamination of all three waste feed lines was deemed incomplete following the initial round of line flushing. Decontamination procedure during line flushing were modified by using steam and Citrikleen solution since organic constituents were targeted for removal.

5.3 <u>Incomplete Items</u>

The validated analytical results from the final rinsate analyses (WFL-1A, WFL-2A and WFL-4A) from the two blended oil feed lines indicated that the levels of organic constituents were above the closure criteria. The closure of these two lines is deemed incomplete.

5.4 Specific Submittals

Specific submittals that constitute a complete closure certification for the incinerator train and the waste feed lines are identified and discussed below.

1. As-built Drawings:

Since all the equipment components that were closed have been removed and disposed of off-site and there was no new construction associated with this closure, as-built drawings are deemed unnecessary and are not included. The drawings and the photographs of the facility prior to closure are included in Appendices A and B, respectively.

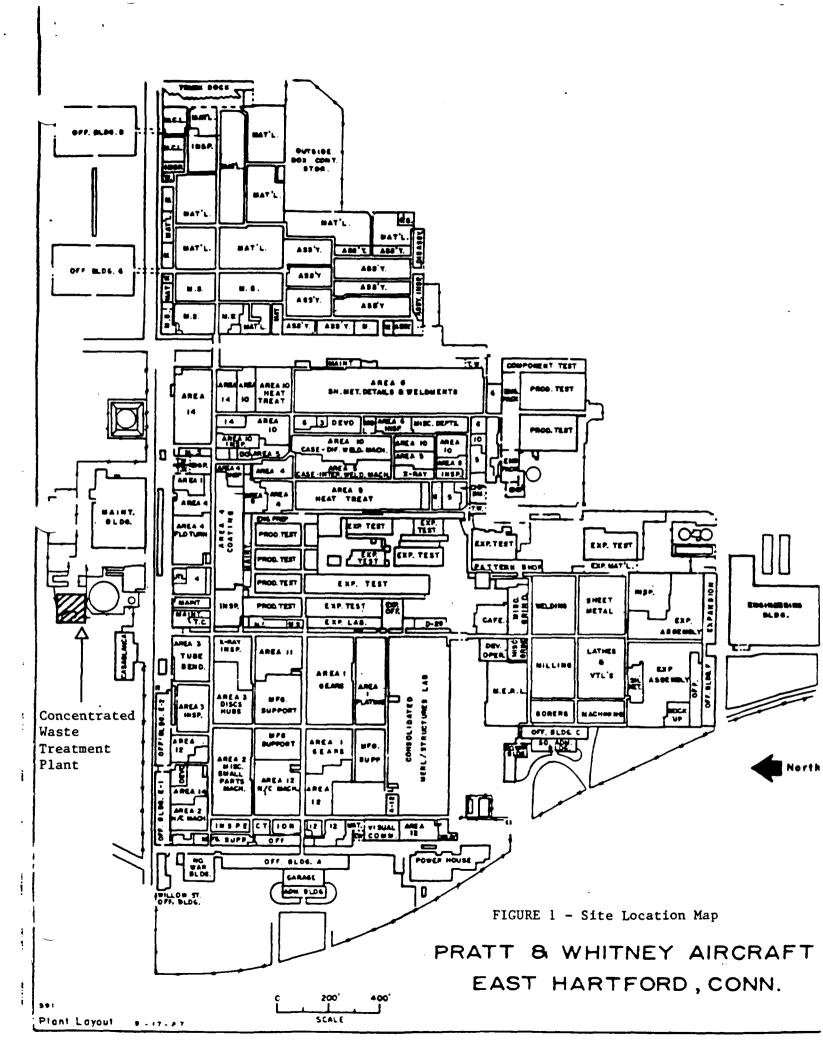
Soil Verification Test Results:

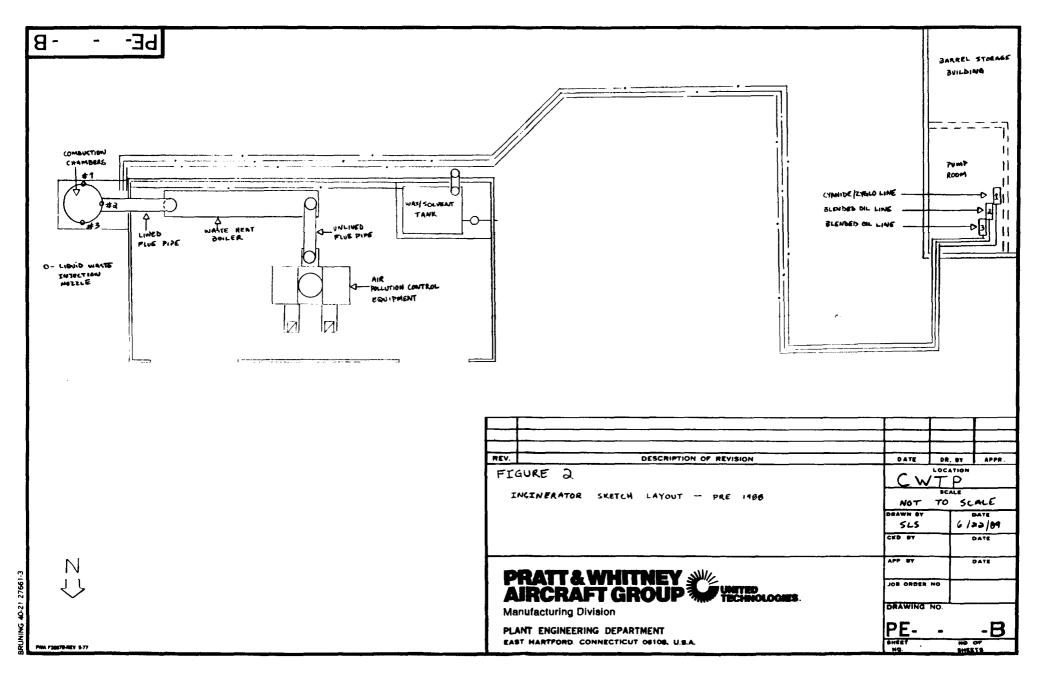
Soil verification tests were not required by the approved closure plan.

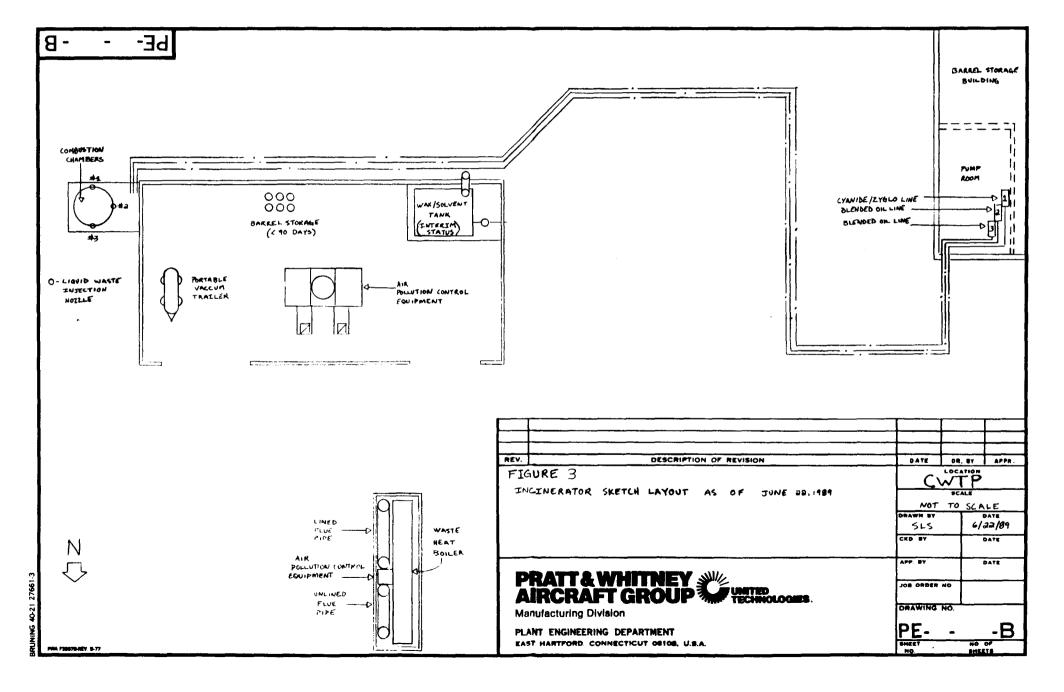
- 3. Appendix IX Test Results:
 Appendix IX testing was not required by the approved closure plan
- Photographic Records of Closure
 These are included in Appendix F.
- Summary of Daily Logs
 These are included in Appendix E.
- List of Minor Departures:
 These are discussed in sub-Section 5.2.

APPENDIX A

Drawings of the Incineration System







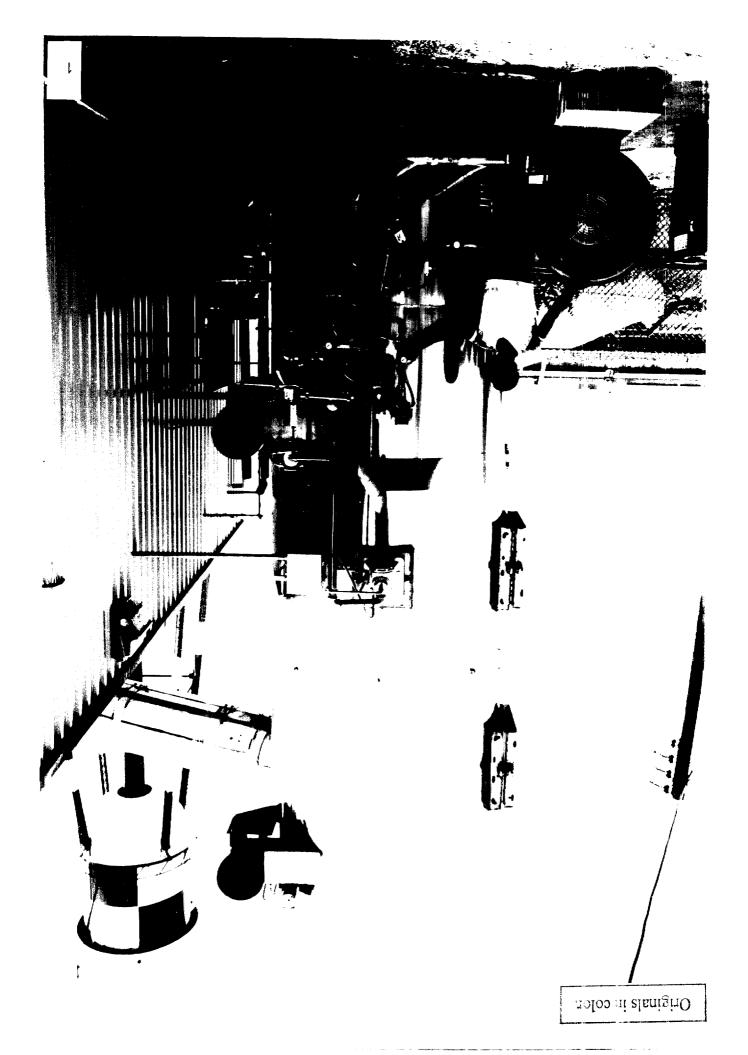
HAZARDOUS WASTE INCINERATION SYSTEM INSTALLED AT PRATT & WHITNEY, EAST HARTFORD, CONN. AUXILLIARY AIR BLOWERS TEMPERING AIR BLOWER BLOWERS . MAXON 2,500,000 BTU/HR BAS/OIL SECONDARY BURNER BURN-ZOL ADJUUSTABLE VENTURI BURN-ZOL PACKED TOWER SCRUBBER-SCRUBBER 28" O.D. WITH 3" NOITALUZNI 21 '-3" LINER DEMISTER PADS 16" 0.0.3 POLYPROPYLENE MAXON 1,500,000 BTU/HR GAS/01L PRIMARY BURNER (2 USED), 20: | THROTTLEABLE ACCESS PACKING PORTS (TYPICAL) **ECLIPSE** MODEL 3 HRW WASTE BURNER - ZOL MODEL 272 HEAT BOILER & PROPORTIONED INCINERATOR CONTROLS FLOOR 22 '-2" NOTE: A 1,200 ACFM COMBUSTION AIR BLOWER FEEDS THE 3 INCINERATOR BURNERS

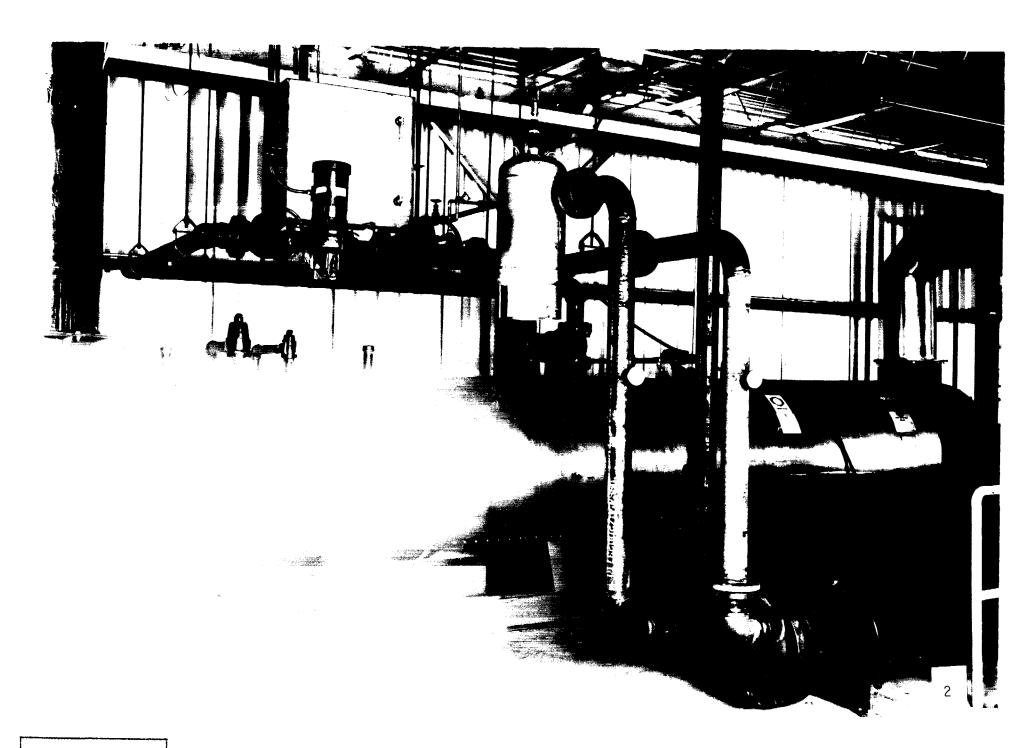
APPENDIX B

 $\label{prop:continuous} Photographs \ \ \mbox{of the} \ \ \mbox{Incineration System}$

LIST OF PHOTOGRAPHS OF THE INCINERATION SYSTEM AS INSTALLED

NUMBER	<u>DESCRIPTION</u>
1	The combustion chamber located outside the building (81C2185-015)
2	The waste heat boiler located inside the building (81C2185-014)
3	The air pollution control system located in the pit inside the building (82C5872-001)







Originals in color.

APPENDIX C

List of Constituents Requiring Analysis

HAZARDOUS WASTE INCINERATOR CLOSURE PLAN

11.0 TESTING AND DETERMINATION PROCEDURES

A specific analytical parameter list has been developed for all ash/residue, waste feed line rinsate and concrete chip samples collected during incinerator train closure activities. As presented in Table 2 this list is representative of all listed hazardous waste constituents potentially present in the cyanide solution and wax/solvent mixture, the only waste streams burned in the incinerator. In addition, the characteristic hazardous waste parameters of corrosivity and extraction procedure toxicity have been deemed applicable and are therefore included.

TABLE 2
LISTED HAZARDOUS WASTE CONSTITUENT PARAMETERS
AND ANALYTICAL METHODS

<u>Parameter</u>	<u>Aqueous</u> (Rinsate)	Solid-Mass Analysis (Concrete chip/ ash/residue)		
<u>Metals</u>		, 45, 2002440,		
Arsenic	3010/7060	3050/7060		
Barium	3010/6010	3050/6010		
Cadmium	3010/6010	3050/6010		
Chromium (Total)	3010/6010	3050/6010		
Chromium VI	 /7196	/7196		
Copper	3010/6010	3050/6010		
Lead	3010/6010	3050/6010		
Mercury	3010/7470	3050/7471		
Nickel	3010/6010	3050/6010		
Selenium	3010/7740	3050/7740		
Silver	3010/6010	3050/6010		
<u>Cyanide</u>	/9010	/9010		
Volatile Organic Compounds				
Carbon Tetrachloride	5030/8010	5030/8010		
1,1-Dichloroethylene	5030/8010	5030/8010		

Darameter

HAZARDOUS WASTE INCINERATOR CLOSURE PLAN

Methylene Chloride	5030/8010	5030/8010
Tetrachloroethylene	5030/8010	5030/8010
1,1,1-Trichloroethane	5030/8010	5030/8010
Trichloroethylene	5030/8010	5030/8010

^{* 5030/8010 -} preparation method / analytical method

The analytical methods presented above have been selected from the third edition of <u>EPA Publication SW-846</u> - <u>Test Methods for Evaluating Solid Waste</u>. The designated laboratory will follow all applicable internal QA/QC procedures outlined in SW-846.

Upon receipt of the analytical data, an initial evaluation of the results will be performed through data validation. Data validation includes a review of field QA/QC procedures (i.e. trip blanks, field blanks) and laboratory QA/QC procedures (i.e. holding times, blind duplicate analysis, surrogate recoveries). Data points that are not adequately supported by the QA/QC procedures will be referred to the sampling team and/or the laboratory for appropriate corrective actions.

APPENDIX D

Closure Criteria

HAZARDOUS WASTE INCINERATOR CLOSURE PLAN

TABLE 1

TARGET CLEANUP LEVELS
WASTE FEED LINE RINSATE SAMPLING

CONSTITUENT	CONCENTRATION (mg/l)
Arsenic ¹	0.05
Barium ¹	1.0
Cadmium ¹	0.01
Chromium ¹	0.05
Copper ²	1.0
Lead ¹	0.05
Mercury ¹	0.002
Selenium ¹	0.01
Silver ¹	0.05
Cyanide ³	0.2
Carbon Tetrachloride 1	0.005
1,1-Dichloroethylene1	0.007
Methylene Chloride ⁴	0.025
Tetrachloroethylene4	0.02
1,1,1-Trichloroethane1	0.20
Trichloroethylene ¹	0.005

^{1.} EPA Primary Drinking Water Standard (MCL)
2. EPA Secondary Drinking Water Standard (SMCL)
3. Recommended Contaminant Level (RMCL)

4. Connecticut Department of Health Services - Action Level

HAZARDOUS WASTE INCINERATOR CLOSURE PLAN

TABLE 2
HEALTH BASED RISK LEVELS
CONCRETE CHIP SAMPLING

CONSTITUENT	CONCENTRATION (mg/kg)
Arsenic	0.02
Barium	900
Cadmium	*
Chromium vi	90
Copper	*
Lead	*
Mercury	*
Nickel	300
Selenium	*
Silver	50
Cyanide	300
Carbon Tetrachloride	2.7
1,1-Dichloroethylene	5.8
Methylene Chloride	47
Tetrachloroethylene	69
1,1,1-Trichloroethane	2000
Trichloroethylene	32

Risk levels obtained from RCRA Facility Investigation (RFI) Guidance Document (EPA Publication SW-87-001)

^{*} No risk levels identified

APPENDIX E

Copies of Daily Logs

PRATT & WHITNEY BURN-ZOL HAZARDOUS WASTE INCINERATOR DAILY FIELD LOG IT PROJECT NUMBER 515153

Monday 11/13/89

A 5-man crew mobilized from Pittsburgh, Pa., to E. Hartford, Connecticut. After arriving in E. Hartford, the crew contacted Mr. Scott Singer, went to the plant for identification processing, and walked the job site area to discuss objectives and scheduling.

Tuesday 11/14/99

All piping outside of the Burn-Zol unit was dismantled by means of pipe wrenches or cold cutting with reciprocating saw.

Two crew members began removing the outer shell and fiberglass insulation from the large heat exchanger located inside the incinerator building.

All dismantled piping was laid on a double layer of 6 mil polyethylene plastic and covered until a roll off box was delivered.

Wednesday 11/15/89

A crew member continued to dismantle the large heat exchanger while the other two crew members plumbed the waste feed lines to enable us to flush the lines.

Jack Hill from ITFAS arrived on-site to take samples after the waste feed lines had been flushed and rinsed.

At approximately 1330 hours, we began flushing the waste feed lines.

The Blend Oil Line (WFL1) was flushed using a 3-step method:

Step 1 - Approximately 25 gallons of plant tap water was flushed through the line.

Step 2 - Approximately 25 gallons of Citrikleen solution (30%) was pumped through the line.

Step 3 - Approximately 25 gallons of plant tap water was flushed through the line.

The Cyanide Feed Line (WFL3) was flushed using the same 3-step method except that a Sodium Hydroxide solution (25%) was used instead of the Citrikleen solution.

The Zyglo Feed Line (WFL2) was blocked somewhere in the line and could not be flushed. A decision was made by Scott Singer to connect steam to the line to loosen the material.

The flushing operation began outside of the incinerator building. Water and solutions were pumped from this point to the pump room under the drum storage building where the affluent was contained in 55-gallon drums.

Plant tap water was sampled for influent background analysis before the flushing process began.

Affluent samples were taken at the end of the third rinse.

Thursday 11/16/89

Refractory brick that was laying inside the Burn-Zol unit was removed by hand.

Refractory from the large heat exchanger was removed by electric chipping hammer and staged on poly inside the incinerator building.

Materials were purchased and construction of the poly barrier began.

The Burn-Zol unit was to be lowered to the ground today, but due to high winds, this operation was postponed until Friday 11/17/89.

Friday 11/17/89

The crew prepared the Burn-Zol unit for lowering it to the ground.

Refractory brick that was blocking the top opening was knocked out. A cable was rigged through the top openings.

At approximately 1130 hours, the Burn-Zol unit was lowered to the ground and staged on poly.

The large heat exchanger was moved outside the incinerator building and crew member began torch cutting it.

Saturday 11/18/89

One crew member continued dismantling the large heat exchanger.

Three crew members removing refractory from Burn-Zol unit.

All refractory and tubing from heat exchanger were placed in roll off boxes and covered overnight.

Large pieces of the heat exchanger shell were staged on poly and covered overnight.

Monday 11/20/89

Crew continued to dismantle large heat exchanger and remove refractory from the Burn-Zol unit.

Tuesday 11/21/89

Continued removing refractory from the Burn-Zol unit and started cutting the inner and outer shells.

A steam line was connected to the Zyglo Feed Line (WFI2). Steam was applied to the line for approximately six (6) hours. After approximately 25 gallons of product was retrieved, the line was flushed by the 3-step method by using the Citrikleen solution (30%). Effluent samples of the final rinse were taken by Mr. Scott Singer of PWA.

By the end of the shift, the Burn-Zol unit had been completely dismantled.

Wednesday 11/22/89

The large heat exchanger has been completely dismantled.

The small heat exchanger was moved outside and dismantled.

Construction of the poly barrier was completed.

The incinerator building was cleaned out in preparation of inside work.

The crew returned home for Thanksgiving and will return on-site on Monday, 11/29/89.

Monday 11/27/89

An entrance was constructed through the poly barrier.

The crew began dismantling the large scrubber unit and associated piping.

Tuesday 11/28/89

Waste feed lines in the pump room were removed.

The large scrubber was removed and lowered to the ground. The shell was cut in half, the Tellerette packing was removed, and both halves were staged under poly with the Burn-Zol pieces.

One of the plastic tanks in the pit area was completely dismantled. The second plastic tank was 90 percent dismantled.

Wednesday 11/29/89

All contents of the pit area were dismantled and removed.

Crew began dismantling the air pollution control equipment.

The concrete pad that the Burn-Zol unit was placed on was broken up by means of a hydraulic hammer mounted on a backhoe.

Thursday 11/30/89

Continued dismantling equipment and piping inside the incinerator building.

The exhaust stacks that extended through the roof of the incinerator building were cut down, cut into pieces, and lowered to the ground. The pieces were staged under poly along with the Burn-Zol and heat exchanger pieces.

All pieces of the concrete pad were excavated and placed into roll off boxes. A footer was discovered under the concrete pad. Mr. Scott Singer requested that it also be excavated and removed.

The footer was broken into pieces, excavated, and placed outside the work area. The pieces will be taken off-site by the construction crew that was excavating for foundation work.

Friday 12/1/89

Continued to dismantle equipment and piping inside the incinerator building.

Sample results from waste feed line affluents indicated high concentration of organics. It was decided by Mr. Scott Singer that the three lines be steamed for a number of hours and then filled with Citrikleen solution.

The Blend Oil Feed Line (WFL1) was flushed with steam for 7.5 hours and filled with Citrikleen.

Two roll off boxes were weighed, manifested, and taken off-site for transportation to the CWM Emille, Alabama facility.

Dismantlement of equipment and associated piping inside the incinerator building is 100 percent complete.

A flatbed tractor-trailer arrived on-site to transport the large pieces of steel shells.

Saturday 12/2/89

Seventy percent of all electrical control panels and associated conduit were dismantled and staged on pallets outside the incinerator building. FWA will dispose of these components.

All pieces of the Burn-Zol heat exchanger and scrubber units were loaded onto the flatbed trailer. Side boards were put on and the trailer was tarpped and secured.

Flushed the Zyglo Feed Line (WFL2) with steam for five hours.

Monday 12/4/89

Continued dismantling and removing electrical components inside the incinerator building.

Flushed WFI2 with steam for one more hour and then filled it with Citrikleen.

Flushed the Cyanide Feed Line (WFL3) with steam for seven hours.

Dismantlement and removal of equipment inside the incinerator building is 100 percent complete.

The flatbed trailer was weighed, manifested, and transported off-site for disposal.

Tuesday 12/5/89

Filled WFL3 with Citrikleen.

Constructed a decon pad and deconed all equipment and tools by means of steam cleaning.

The floor of the pit area was steam cleaned. The rinsate was pumped out and taken by CWTP personnel.

Wednesday 12/6/89

The ceiling inside the incinerator building was wiped down by means of spraying the ceiling with a Citrikleen solution and wiping with clean lint free cloths.

Thursday 12/7/89

The poly barrier was dismantled and removed from the building.

Jack Hill from ITFAS arrived on-site to take samples.

All three waste feed lines were flushed again using the 3-step method. Effluent samples were taken.

Wipe samples were taken from four areas of the ceiling in the incinerator building. Two background wipe samples were taken over the wax solvent tank area.

Concrete chip samples were taken from the pit area.

Friday 12/8/89

The crew inventoried and packed up all tools and equipment in preparation for demobilization.

The waste feed lines outside the incinerator building were capped.

The last two roll off boxes were weighed, manifested, and transported off-site for disposal.



Crew: T. Dormer P. Andreas F. Paul K. Hohmar J. Pail

- · · ·	
Job Name Pratt + Whitney	Date
Job Number <u>5/5/35</u>	Day Mon
Weather Conditions Junny, Mild	Day <u>Mon</u> Site Conditions <u>Dry</u>
Daily Work Description and Comments (tests, changes, cl	aims, etc.):
Mobilised to Hartford Ct M Identification Process. Walked I Scheduling	Met with Scott Singer, Completed
I dentification process. Walked	the 1sh site area and discussed
Schedoling	<u> </u>
,	
Schedule and Performance Status:	
Additional-Extra Unanticipated Cost Factors:	
Orders, Directives, Notices and Protests:	
Meetings:	
Visitors:	
	1 Journ
	- Light Your



Crew T. Dormer P. Andreas F. Paul K. Hohman T. Pail

Job Name Pratt + Whitney	Date
Job Number <u>5/5/53</u>	Day Tue
Weather Conditions Sunny, Warm	Site Conditions Dry
Daily Work Description and Comments (tests, changes,	
0700 - Tailgate Safety Meeting	
6715 - Unloaded Trailer	
0730 - Began dismantling all pi	ping from the Burn-Zol unit. Piping
30 min. delay because of an air	line Still live. Prws maintenance
man worked on shutting it Off.	
Covered.	
1330 - All piping removed from Burn-20	1. Began removing sheeting & insulation from
large heat exchanger inside the bu	ilding-Continued til end of shift
1400 - Began disconnecting piping in pump	
Schedule and Performance Status: All piping red Tomorrow. CRane scheduled for Thui	<u>.</u>
Additional-Extra Unanticipated Cost Factors:	
Orders, Directives, Notices and Protests:	
Meetings: Meeting with Scott Singer about	Time Sheet, Site Report, Scholling
Visitors:	
VISILUIS.	
	Jon Daniel
Front End Loader Delivered	Gora



T. Durner Pinner. K. h. cago

- ' '	
Job Name Yeatto Whitney	Date
Job Number 5/5/5-3	Day Wed
Weather Conditions Rain in AM 603	Site Conditions Wet
Daily Work Description and Comments (tests, changes,	claims, etc.): 0700- Tailgate Safety Meeting
0715- 2 men Femoving refractory Insula	ation from ends of heat exchanger (boiler)
2 men doing plumbing necessar	
1000- Tack Hill from IT on site	,
1100 - All pumps + hoses set up - read	y for flushing lines
- Waiting on Larry Lucias for rao	1
1330 - Started Flushing lines - Flushed	I waste oil line and the cyanide
Line. Tack Hill Took Samples after the	. Third river. The 2nd waste oil line is
blocked.	
1630-Plumbed an airline to the blocked	l oil line but it would not clear. Will
try Steam when its available	
Schedule and Performance Status: The blocked of	Dil Ima Will be flushed when
steam is available	
• · · · · · · · · · · · · · · · · · · ·	
Additional-Extra Unanticipated Cost Factors:	
·	
Orders, Directives, Notices and Protests:	
Meetings:	
Visitors: Jack Hill-IT FAS, Edison	<i>V.</i> J.
	Lame
	Jour Strawer
2 nd Mar of delivered	You

Crow T Dormer
Province
Front
K Hohman

11:5 1-



-	
Job Name Tratt Whitney	Date
Job Number 5.5/33	Day Thur
Weather Conditions Neavy rs. a. high winds	Site Conditions Wet
	claims, etc.): 0700, Toulgate Safety Meeting
0715 - Started removing refractor	4 from inside Burnzol incinerator.
-Loaded material into bucket of	front Loader
- Loaded refractory from heat exc	hauger into bucker of front loader
· Covered front loader bucket with	,
- Cleaneth up area around heat exchi	· · · · · · · · · · · · · · · · · · ·
1300 - Purchased Jumber and began a finished by end of shift	U
Schedule and Performance Status: Will not altern Of weather Condition	upt to lower Burn-zol unit because
Additional-Extra Unanticipated Cost Factors:	
Orders, Directives, Notices and Protests:	
Moetings: Meeting with Scort Singer. Discus of a Closed valve near the Storage are	used flushing of blocked on Line. Possibility ca. Steam is now available if needed
Visitors:	1 Chamer
	Hom Dome
1 Roll Off Blox achieced	1



Crew: T. Dormer
P. Andreas
F. Paul
K. Hohman
T. Pail

Job Name Pratt + Whitney	31/10/09
	Date
Job Number <u>51.5/53</u>	Day
Weather Conditions Clear Cold	Site Conditions Dy
Daily Work Description and Comments (tests, changes, cl	aims, etc.): Otw-Tailgate Safety Meeting
0715 - Began preparing To Lower Burn.	Zol Unit to ground. Knocked out refractory
D715 - Began preparing to Lower Burn. brick that was blocking the top opening.	Moved Rell Off pox to the front of the
incinerator bloks	
0900 Apided for Burning Permit. Dragged the	keat exchanger outside & began cutting it
1000 - Crane operator from PWA arrived. R	igged a cable Thre the Top port of the
Burn Zul Unit + hooked on To the Crane.	•
1130 - Burn-zol unit lowered To the ground to	tru staged outside and the incinerator
bldg on poly	,
1400- Began cutting the outer shell of the	Burn 2d unit
1700 - Top half of head exchange renoved. Al	11 pieces covered overnidet
Schedule and Performance Status:	0
Additional Evtra I Inantinipated Cost Easters:	
Additional-Extra Unanticipated Cost Factors:	
Orders, Directives, Notices and Protests:	
Meetings:	
	2 Daniel
Visitors:	
	- Hor



Crew

T Dormer

P. Andreas

F. Paul

K. Hohman

DAILY SITE REPORT

J. Pail

Job Name Pratt + Whitney	Date
Job Number <u>5/5/53</u>	Day Sat
Weather Conditions Cloudy, Cold	Site Conditions Dry
Daily Work Description and Comments (tests, changes,	
0715- 1 May cutting heat exchange	
3 Men removing refractory	From Burn Zol unit
Continued these operations tile	end of shift at 1530
All pieces covered with poly	at end of shift
Schedule and Performance Status:	
	<u></u>
Additional-Extra Unanticipated Cost Factors:	
·	
Orders, Directives, Notices and Protests:	
Meetings:	
	1 TWILL
Visitors:	Llow

_	-				
Equ	ipment	:	1 .	pick	υρ

1- 3yd Loader

2. Man Lifts

2. Demo Sam

2- Demo Hammers

1-Roll Off

Crew T Dormer

P Andreas

F. Paul

K. Nohman

J. Pail

Job Name Pratty Whitney	Date 11/20/89
Job Number	Day Nan Dons Wex
Weather Conditions Cloudy, Cool, Rain in AM Site Condition	ons wex
Daily Work Description and Comments (tests, changes, claims, etc.): <u>© 700 -</u>	
0715 - Continued dismonthing heat exchange and i	emoving refractory
From Burn-Zol unit for entire day.	
<u> </u>	
1730 - End of Shift	
Schedule and Performance Status: 2nd Roll Off heng delivered	Tomorrow)
Will attempt to flushe Zyglo line with steam	Tomaccael
will allempt to trooms 2400 time with steam	1011100,
Additional-Extra Unanticipated Cost Factors:	
Orders, Directives, Notices and Protests:	
<u> </u>	
Meetings:	
Visitors:	
	Jon Downer
	70'

INTERNATIONAL TECHNOLOGY CORPORATION

Equipment: 1- Pick up

1- Equip. trailer

1- 3 yel loader

NAL

1- man lift

1- Susors lift

2- Demo Saws

Crew T. Dormer
P. Andreas
F. Paul
K. Hohman
T. Paul

DAILY SITE REPORT

2- Demo Hammers

Job Name Tratt & Whitney	Date
Job Number	Day_Tue
Weather Conditions Cold, Windy	Site Conditions Dy
	anges, claims, etc.): Ozoo - Tailgate Safety Meeting
0715 - 1 Man Cutting Shell of Bo	orn 2d outt
I man removing refractory	- 2 men hooking up steam line to Zyclo line
0800 - Turnedon steam to zyglo la	te - very little Coming out other end
0830- All refractury removed from	Burg Tol unit
1100 - Retrieved approx 25 Gal of G	Green liquid from Zyglo line. Shut off steam
Re-plumbing to run water to	
'	Led the fill one - 10,000 Lb over - will have to take off
	h water, citrikken water. Clear water coming out
1445 - Scott Singer Takes Samples	,
1730 - ENCL of Shift	
Additional-Extra Unanticipated Cost Factors:	dismanting Completed. Large heat exchanger
Orders, Directives, Notices and Protests:	
Meetings:	
Visitors:	

Exchanged Invanlift for I sissons lift



Eguipment

1. Pickup
1- Equip Traler
1. 3yd loader
1- Man lift
1- Sissor lift
2. Demo Saws
2 Demi Hammers
a. Roll off boxes

Grew!	T Dormer
	P. Andreas
	K. Hohman
	J. Pail
	J. Sardello

Job Name Pratt + Whitney	Date 11/22/89
Job Number	Day Wed
Weather Conditions Clear Cold	Site Conditions Dy
Daily Work Description and Comments (tests, changes, claim	, , ,
0715 - Continued dismantling large he	rat exchanger
0730 - Began Construction of polyethyles	ne wall
0900 - Large heat exchanger completely	dismonthed
0930 - placed small heat exchanger o	otside + began dismontting
1200 - Small heat exchanger complete	ely dumantied-placed in roll off
1300 - Poly wall completed	•
1330 - Cleaned out incinerator room	of all debri
1400 - Placed all equipment inside inc	incrator room
- Covered rolloff boxes & Burn Tol	pieces
1430 - End of Shaft	·
Schedule and Performance Status: Flat bed Sched	tuled for Tue (11/28/89) for
Transporting pieces of Burn Zol un	eit
Additional-Extra Unanticipated Cost Factors:	
Orders, Directives, Notices and Protests:	
Meetings:	
Visitors:	
	Jon Domes
	40m

Equipment: 1. Pick up
1- Equip traler
1- 3yd loader
1- man lift
1- Sissor Lift

2. Demo Saws

2-Roll Off Buci

Crew: T. Dormer P. Andreas K. Hohman

V. Pail

J. Sardello

Job Name Pratt + Whitney	Date
Job Number 55/53	Day Mon
Weather Conditions Clear, Cool	Site Conditions Dry
Daily Work Description and Comments (tests, changes,	
1300 - Constructed a doorway thro to	te poly wall.
1330 - Began dismonting scrubber un	
1630 - Began removing Dive Inside	
1730 - Encl of Shift	
Schedule and Performance Status: Sea Land Car	nnot supply Roll Off boxes when needed. Freehold N.J They will deliver
Contacted treehold Carrage Inc. of	treehold N.V They will deliver
a roll off box tomorrow	
Additional-Extra Unanticipated Cost Factors:	
Orders, Directives, Notices and Protests:	
	
Meetings:	
MI-tan	
Visitors:	Jour Dormer
	Cford Ville

INTERNATIONAL TECHNOLOGY CORPORATION

Equipment: 1- Pickup
1- Equip trailer
1- 24d loader
1- Man lift
TIONAL
1- Sissor Lift
OGY
1- Demo Sand
3- Poll off Boxes

Crew: T. Dormer P. Andreas K. Hohman F. Paul J. Sardello

Job Name Dratt + Whitney	Date
Job Number 5/5/5-3	Day_Tue
Weather Conditions Coul, Rain in AM	Site Conditions Wet
0715 - Two men Continue removing pipe	claims, etc.): 0700 · Tailgate Safety Meeting
- Two men continue dismantling	
,	to scrubber semoved. Torch cut part
	& scrubber from pit area by forklift,
1300 - Laid Scrubber down on the	,
- 2 men begin cleaning out pit	· · · · · · · · · · · · · · · · · · ·
1530-Scrubber unit is cut in half - Top hal	, ,
Tellerette packing & placing in roll of	
	I Plastic tank in pit completely dismonthed
2nd tank 90% dismantled 1730 -	
Schedule and Performance Status: Flat bed Train	ler for Burn 201 pieces didn't arrive
	'
Additional-Extra Unanticipated Cost Factors: ### 00	serhead heater with forklift when
Moving Scrubber unit - Steam leak	Eing. Shut off steam
Order Directives Nations and Brotesto	
Orders, Directives, Notices and Protests:	
Meetings:	
	- Some
Visitors:	
1100- Roll off box from Freehold Carta	ge Inc. delwcred

INTERNATIONAL TECHNOLOGY CORFORATION

Equipment 1 Peck up 1- Equip Trader 1- 24d loader i- maulift 1- 315500 lift 2 Denne saws 3. Roll of Boves 1- Cat 416 Backhoe/Lundar DAILY SITE REPORT (From T Darmer P. Andreas K Nohman J Pail J Sardello

Job Name Tratt + Whitney	Date
Job Number	Day Wed
Weather Conditions Clear Cold Site Conditions	ions DCY
Daily Work Description and Comments (tests, changes, claims, etc.): 0700.	· Tailgate Safety Meeting
0915 - Continued dismantling contents of pit: PI	astic + Cak, Motors
steel frame, etc.	
1100 - Pit area completely cleaned out. Man from	CUTP pumped out
water from pit	, ,
1300- Began removing air pollution control equipment	<u> </u>
1400 - Backhoe with hammer attachment delivered;	Began breaking up
Burnzal pad	
1600 - Burn 701 pad broken up, will load into Rell	offi on Thorsor Fri
1630 - Transferred some debre from Poll off #/ to Ro	
1780 - End of Shift	
Schedule and Performance Status: Dismantling of equiment	inside bldg. 75%
Complete. 4th Rell Off Box delivered Tomorrow	,
Additional-Extra Unanticipated Cost Factors:	
Orders, Directives, Notices and Protests:	
Orders, Directives, Notices and Violotics.	
Meetings: Meeting with Scott Singer - Sample result from	Blench Oil Feed line
indicates high concentration of Organics, Will Flus	ih with steam
The second of th	
Visitors:	
Y 131LU13	Agen Drawer
	Goin



Equipment

1- Pict up
1- Equip trader
1- Equip trader
1- Cat 414 backner
1- Man lift
1- Sissor lift
2- Demo Saws
4- Roll Off Boxes

Crew: TDormer
P Andices
K Hohman
T Pail
T. Sardello

Job Name Fruit + Whitney	Date 11/30/89
Job Number	Day Thurs.
Weather Conditions Cloudy, Cold	Site Conditions Dry
Daily Work Description and Comments (tests, chan	iges, claims, etc.): 0700 - 10,19ate Safety Meeling
0715 . Continue dismonthing equipment	traside bldg.
10BO - Bucket for backlus delisere	ed - mounting outo backhoe
1045 - 2 men on roof of Bldg C	otting down eshaut stacks
1045- 4th Roll Off Box delivered	
1330- Roth exhaust stacks cut into	picces and lowered from roof
1400-All Concrete From Burn 201 pad	removed. Discovered aforter around
the perimeter of the pad. Will exc.	avate and remark as per Scott Singer
1600 - Excavated around footer under	- Burn Zol pad. Faster 15 / piece-will
have to demolish with hydraulic hamme	137
1730 - End of Shift - Footer dem	whished + Cxcavated; backfilled hole
	equipment from inside of bldg 90%
Complete Cannot plumb steam	Into broken poper in pump room - will
attempt the Tomorrow	
Additional-Extra Unanticipated Cost Factors:	
Orders, Directives, Notices and Protests:	
Meetings:	
	T C
Visitors: Bill Gadie, Skip Brenna	n-1/Corp.
	Line Dominer

INTERNATIONAL TECHNOLOGY CORPORATION

Equipment

1. Pickup
1- Equip Trailer
1. Lyd loader
1. Cat 416 Backhoe/Lunder
1- Man lift
1- Sissor Lift
2. Demo Saws
4- Roll Off Boxel
DAILY SITE REPORT

Crew	T. Dormer
	P. Andreas
	K Nohaman
	7 Paul
	J. Sardello

Job Name Tratt + Whitney	Date 12/1/89
Job Number	Day
Weather Conditions Clear, Cld	Site Conditions Dry
Daily Work Description and Comments (tests, cha	nges, claims, etc.): 0700 - Tailgate Safety Meeting
0765 - Continued dismantling equip	
	till power in one of the control panels to be
renewed. Contacted Rich - h	e'll get an electrician to lock it out.
0900-Truck from Sea Land arrived	to transport 1 roll off box To Landfill
1300 - Plumbing product feed lines	to flush with steam
1330 - Truck from Sea Land acruse	I for 2nd RILLOSS. Both Roll OFFS Weighed
manifested and transported o	
1400-1700 - Flushed WFLI with 8:	
1600 - Flat bett truck arrives	
1730 - Ead of Shift	s of equipment inside bldg 100 To complete
Additional-Extra Unanticipated Cost Factors:	SMPONER S TORISTPIN
Orders, Directives, Notices and Protests: Cut a the wax solvent Tank - as per	nd remove copper water line feeding " Rich
Meetings:	
Visitors:	
	Down



Equipment: 1- Pickup
1- Equip. Trailer
1- 244 loader
ATIONAL 1- Cat 416 Backhor/Eucoder 1- Man Lift 1- Sissor Lift 2- Dem Saus 2- Roll Off Brics DAILY SITE REPORT

Gew	T. Dormer
	P. Andrews
	K Kohman
	J Pail

J. Sardello

Job Name Thatt Y-Whilney	Date
Job Number 575/53	Day <u>Sát.</u>
Weather Conditions Cloudy, Cold	Site Conditions Dry
Daily Work Description and Comments (tests, cha	anges, claims, etc.): O 700 - Tailgate Safety Meeting
0715 - 2 men inside bldg removing	Clertrical Components
-3 Men Loading Flat bed a	with Burn Zd pieces
0800- Continued flushing WFL I	with Steam until 1030
1030 - Started Flushing WFL 2 u	th steam
1300 - All pieces of Burn Zol unit +	Scrubber unit loaded onto flat bed.
1330 - Pieca OF Conduit loaded	int. Non Hazardous roll off box.
1400-2 large pieces of Burn 201 0	charist flute were proten up and placed into
rall off box	
1530. End of Shift	
Schedule and Performance Status: Remanual of	electrical Components 70% Complete. Moulit
not working-need mechanic in	on Menday
Additional-Extra Unanticipated Cost Factors:	
Orders, Directives, Notices and Protests:	
Meetings:	
Visitors:	
	1 Some



Equipment

:	1- Pick up
	1- Egup Trales
	1- 2 ya Logales
	1- Cat 416 Back two / lade
	1- Man Lift
	1 0 14
	2 Dem Same *1. forklift
	2 Pull Off Roxel

Crew	T. Dormer
	P. Andrews
	K Hohman
	J. Pail

J. Sardelle

Job Name Hatt & Whitney	Date 12/4/89
Job Number	Day Mon
Weather Conditions Cleur Cold	Site Conditions Dry, Tcy
Daily Work Description and Comments (tests, changes, cla	ims, etc.): 0700 - Taugate Safety Meeting
0715 - Continued renoving electrical	Compnetts
0180 - Continued flushing WFL2 bed	cause the efflient is still greenish
in color and has an odor to it.	
080 - Effluent From WFL2 appears Cleane	r + free from odor. Switched steam
over to WFL3	
1130 - Romoval of Electrical Components 10	0% Compete
1400-1500- Filled WFL 1+2 with Citrikleen	
1530 - Shot off Steam to WFL3	
1530-1730 - Removed extra piping + Cleaned	inside of bldg
1730- End of Shift	,
Schedule and Performance Status: Reminal of All ego	ipment inside bldg 100% complete
Will decon equipment, steam clean the pi	
Additional-Extra Unanticipated Cost Factors:	
Orders, Directives, Notices and Protests:	
Meetings:	
Visitors:	1 Journe
	Charles and the second



Equipment

1- Pick up
1- Equip Trader
1. 2yd looder
1-Cat 416 Loader
1-Fork Lift
1. Man Lift
1- Sissor Lift 1-Steam Cleaner
2- Demo Saws
- T // ACC T

Crew T. Dormer P. Andreas K. Holman

J. Pail

J. Sardello

2- Tell Off Boxes DAILY SITE REPORT

	/ - /- 0
Job Name Pratt + Whitney	Date
Job Number <u>5/5/53</u>	Day_Tue
Weather Conditions Clear, Cold	Site Conditions Dry
Daily Work Description and Comments (tests, changes, c	laims, etc.): 0700-Tailgate Sofety Meeting
0715 - Stated Filling WFL 3 with Citri	Kleen
0800 - Constructed a decon pad	
0830 - Steam Cleaner delivered	
0900 - Bagan Decouning heary equipment	<u> </u>
1000 - Beepn Steam Cleaning pit area	
1100 - Took a sample of rinsate water fr	on pit area + Tested. Result Still
indicate Cyanide - will pump off water	er into portable tank supplied by CUTP
indicate Cyanide - will pump off water 1300 - Finish Steam Cleaning Pit - Pumped of	furter-vacuum water - scraped out
the sump - blew air on pit floor to dry	
1500- Tried Shot blasting the pit floor. Shot Bla	iter will not work 1730 - End of Shift
Schedule and Performance Status: Start Wiping Cellin	
	,
Additional-Extra Unanticipated Cost Factors: Scaland	Trucks Council enter Emille - No approval
from State yet. Extra Charges for demura	
Time Cial Pill Dilla San Ja	
On the Principle of the	
Orders, Directives, Notices and Protests:	
Meetings:	
	7 - 111
Visitors:	Low Dormer
	· · · · · · · · · · · · · · · · · · ·



Equipment!

1- Pick Up
1- Equip Trailer
1- 2 ya Loader
1- Cat 416 Buckbe
1- Fork Lift
1- Man Lift
1- Sisser Lift
2- Roll Off Bores
DAILY SITE REPORT

Crew T Dormer

P Andreas

K Hohman

T Pail

J Sardello

Job Name Pratt - Whitney	Date _/2/6/89
Job Number <u>5/5/5/3</u>	Day Wed
Weather Conditions Cloudy, Cold	Site Conditions Dry
Daily Work Description and Comments (tests, changes, claims	
0730-Crew begins Ceiling Wipe down.	2 men in B Sissor Lift Starting
In South West Corner of building & wo	
In the man lift starting in the North W	
their way East.	
1200-2/3 of calling comptele	
1230 - Continue wiping ceiling	
1630 - Finish wiping Ceiling	
1730 - Eucl of Shift	
Schedule and Performance Status: Wipe dawn of	ceiling 100% Camplete. All
Sampling will be done Tomorrow	, , , , , , , , , , , , , , , , , , ,
Additional-Extra Unanticipated Cost Factors:	
Orders, Directives, Notices and Protests:	
Meetings:	
Wildelings.	
Visitors:	
-	Jon Dames
	Jan J



DAILY SITE REPORT

Job Name Pratt & Whitney Date 12/8/89
Job Number 515-15-3 Day there
Weather Conditions Clear, Colof Site Conditions Dy
Daily Work Description and Comments (tests, changes, claims, etc.): 5700 - Tailgate Safety Meeting
0715 - Craw dismanting Poly wall.
1800 - Plumbing weste feed lines
1045- Jack Hill from FAS arrives on site
1145 Begin Flushing waste feed lines + sampling - 1230 finish
1230 - Started Taking Chip samples from pit area
1430 - Scott Sugar - Tock Hill begin wipe sampling celling
1630- Wipe Sampling of Certine Complete
1630- Wipe Sampling of Certing Complete
Schedule and Performance Status:
Additional-Extra Unanticipated Cost Factors:
Orders, Directives, Notices and Protests:
Meetings:
gs.
Visitors: Tack Hill - IT FAS

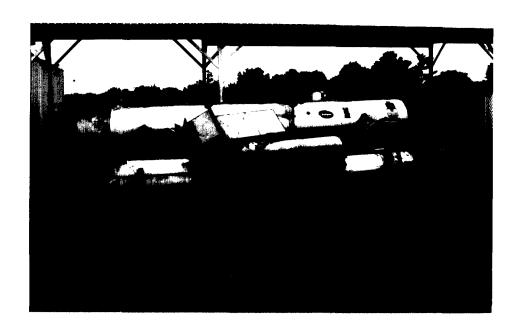


DAILY SITE REPORT

• • •	
Job Name Drato & Whitney	Date 12/8/89
Job Number <u>SIIIS</u>	Day Fri
Weather Conditions Couly, Cold	Site Conditions Dry
Daily Work Description and Comments (tests, changes, cla	
DOO - Craw Inventory Equipment	-Materials
- Loading Trailer	
0800 - Dismantled Step by Trailer. 0930 - Front Encl loader taken Off	Plugged waste feed lines outside of bidg.
0930 - Front End localer taken Off	site
1000- Man Lift + Sissor Lift taken	OFF SITE
1280 - Truck From Freehold Cartage	acrives on site - weight + mainfetts
I roll off box. Werghs 2nd F.	all off box. 2nd truck not
expected til Late afternoon	
of and Truck expected on site &	xetween 1400-1500
Schedule and Performance Status: IT's Reutal — Office Trailer, 10 bottles of a	Equipment Still to be picked up
Additional-Extra Unanticipated Cost Factors:	
Orders, Directives, Notices and Protests:	
Meetings:	
Visitors:	- Jan-
	- Clari
	- 0

APPENDIX F

Photographs Showing Closure Activities



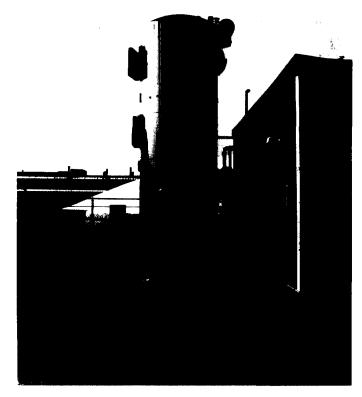
1. Incinerator train components dismantled and stored on-site in 1988. These included the waste heat boiler (back), the heat exchanger (front left), the flue piping and a portion of the air pollution control equipment.

June 21, 1989



2. Incinerator train components (center) and the dedicated enclosure (right) for these.

June 21, 1989



3. The combustion chamber and the associated above ground piping prior to start of closure.

June 23, 1989



4. The air pollution control equipment located inside the building in a pit.

June 23, 1989



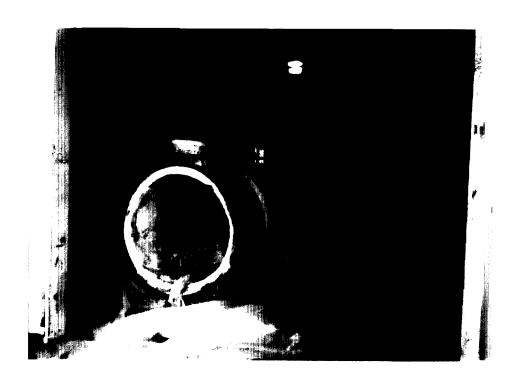
5. The outside view of the building that houses the active wax/solvent storage tank and the air pollution control equipment. The combustion chamber is located on the side of the building and the exhaust stacks are located on top of the building.

June 23, 1989



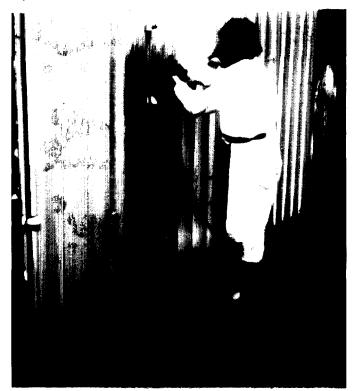
6. Ground is covered with plastic sheet prior to dismantling of outside piping for storing dismantled piping.

November 14, 1989



7. Insulation removal from the large heat exchanger.

November 14, 1989



8. Waste feed line decontamination set up.

November 15, 1989



9. Rinsate collection system for waste feed line decontamination set up.

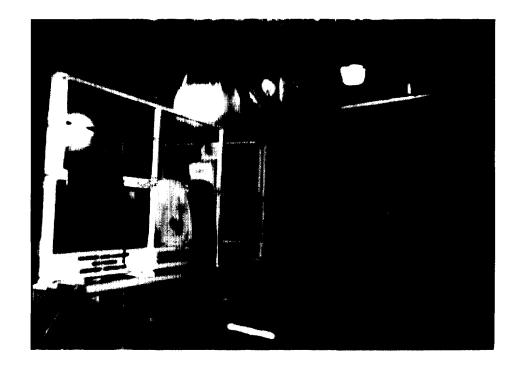
November 15, 1989



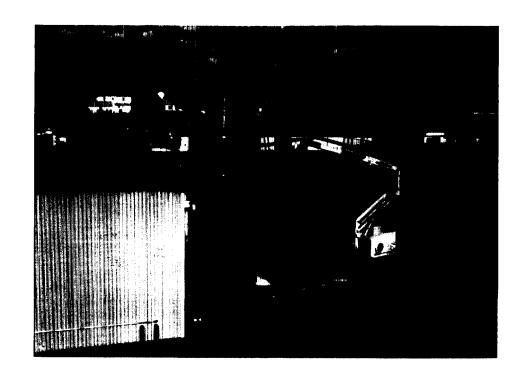
10. Waste feed line flushing.
November 15, 1989



11. Rinsate collection from waste feed line flushing operation.
November 15, 1989



12. Plastic barrier inside the building.
November 16, 1989



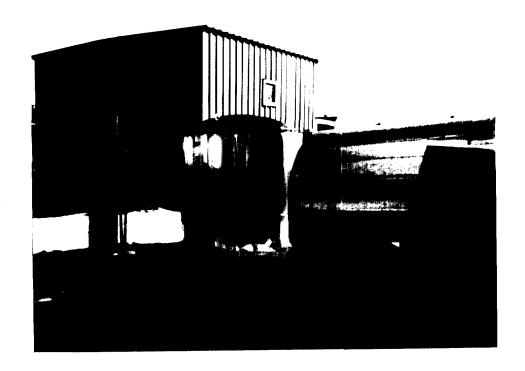
13. Preparation for dismantling the combustion chamber.

November 17, 1989

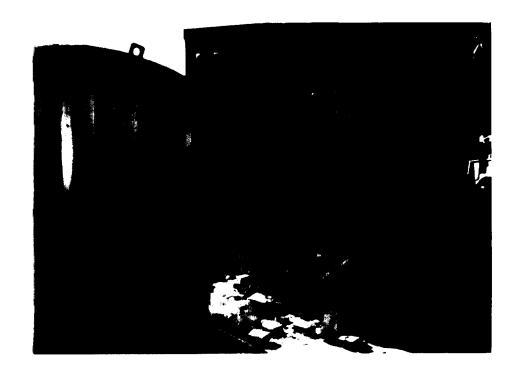


14. Removal of the large heat exchanger.

November 17, 1989



15. The combustion chamber is dismantled and lowered to ground.
November 17, 1989



16. Removal of refractory from combustion chamber.
November 20, 1989



17. Dismantled combustion chamber and heat exchanger.

November 22, 1989

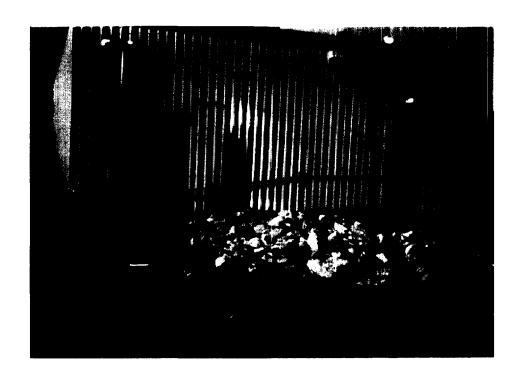


18. Combustion chamber pad after removal of the combustion chamber.
November 22, 1989



19. Concrete pad prior to removal.

November 29, 1989



20. Concrete pad completely broken up.

November 29, 1989



21. Concrete pad completely removed.

November 29, 1989



22. Boarded, tarped and secured flat bed trailer containing large dismantled equipment pieces ready for transport.

December 2, 1989



23. Final round of waste feed line flushing.

December 7, 1989



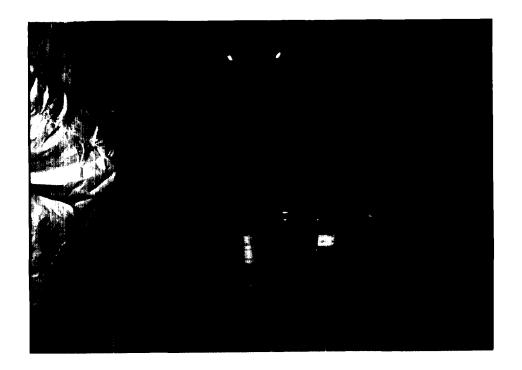
24. Final round of rinsate collection.

December 7, 1989



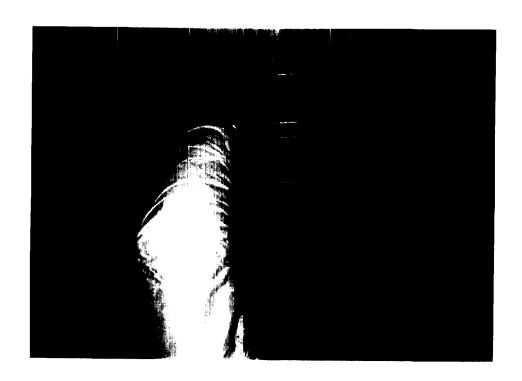
25. Waste feed line rinsate sampling.

December 7, 1989



26. Waste feed line rinsate sampling.

December 7, 1989



27. Ceiling wipe sampling.

December 7, 1989



28. Scrubber pit concrete chip sampling.

December 7, 1989



29. The last two roll-off containers containing small equipment pieces and debris ready for transportation.

December 8, 1989

$\label{eq:APPENDIX} \textbf{G}$ $\mbox{Health and Safety Plan}$

HEALTH AND SAFETY PLAN

PRATT AND WHITNEY EAST HARIFORD, CONNECTICUT

Prepared for
Pratt and Whitney
600 Main Street
East Hartford, Connecticut 06108

Prepared by IT Corporation 2790 Mosside Blvd. Monroeville, PA 15146

November 8, 1989

Project No. 515153

HEALTH AND SAFETY PLAN PRATT & WHITNEY, EAST HARTFORD, CONNECTICUT

A. INTRODUCTION

This plan describes the site Health and Safety procedures that will be implemented and followed by International Technology (IT) and subcontractor personnel during project activities at the Pratt and Whitney Facility in East Hartford, Connecticut.

The requirements of this plan shall apply to all personnel at the work site, including regulatory personnel. IT policy is to conduct all activities in a manner that protects the health of project personnel and the public.

All applicable chemical hazards previously identified have been used as guidelines for this health and safety plan. All activities shall be conducted so that the health and safety of the project personnel and the public are completely protected. The following program includes general safe work practices, personnel protection, personnel and equipment safety, medical surveillance, air quality monitoring and training requirements. The plan covers the safe work practices for physical, chemical and fire hazards. In addition, details for emergency response, first-aid capabilities and fire control are included.

The specification of this health and safety plan shall meet all requirements of both state and federal regulations, and IT procedures.

B. RESPONSIBILITIES

Health and Safety Representative

The Health and Safety representative will be responsible for technical development and coordination of the site health and safety program. Any discussions on matters relating to project health and safety with the Connecticut DEP, USEPA or OSHA will be the responsibility of the health and safety representative. In addition, this individual will provide the site project manager with details concerning the complete work specific programs.

Project Manager

The project manager shall be responsible for field implementation of the health and safety plan. This shall include communication of the site requirements to all personnel participating in the project. Additional communication may be required by the site supervisor to include consultation with the safety and health representative regarding appropriate changes to the health and safety plan. Tailgate safety meetings will be held daily to communicate pertinent health and safety information to all project personnel.

Team Members

All team members shall be responsible for understanding and complying with all site health and safety requirements. One member of the project group shall be assigned the responsibility of cleaning and maintaining the safety equipment and maintaining the decontamination area. All members of this group shall have been provided formal classroom training regarding the hazards and protection involved with this project.

C. HAZARD ASSESSMENT

In dealing with the operations involved in a potentially hazardous location, a variety of safety hazards may exist. All personnel working within the exclusion zone will be familiar with these hazards. These safety precautions will be reiterated during the daily Tailgate Safety meetings.

C.1 Chemical Hazards

The potential chemical hazards involved in this project are airborne concentrations of organic hydrocarbons and heavy metals. Organic vapors may pose a flammability hazard as well as a health hazard.

High vapor concentration of the materials listed in the table in Section C.2 are potentially irritating to the eyes and the respiratory tract, may cause headaches and dizziness, are anesthetic, may cause unconsciousness, and may have other central nervous system effects. Prolonged or repeated liquid contact with the skin will dry and defat the skin leading to dermatitis or irritation.

Exposure to dust containing heavy metals may cause effects such as acute poisoning, cumulative poisoning, anemia, and cancers. Such effects are normally associated with long term exposures.

Sodium hydroxide will be used for decontamination. Sodium hydroxide is extremely corrosive to the skin and eyes.

C.2 Exposure Standards

Threshold Limit Values (TLVs) refer to airborne concentration of substances which represent conditions that nearly all employees may be repeatedly exposed to day after day without adverse effect. These threshold limits are prescribed by the American Conference of Governmental Industrial Hygienist (ACGIH). They are based upon the best available information from industrial experience and animal or human studies. Because of the wide variation in individual susceptibility, a small percentage of workers may experience discomfort from some substances at

concentrations below the recommended values. It has been policy to use these guidelines for good hygienic practices; however, whenever applicable, stricter guidelines may be utilized.

Currently, exposure guidelines to pesticides and other chemical substances are regulated by the Federal Occupational Safety and Health Administration (OSHA). These exposures are based upon the Time-Weighted Average (TWA) concentration for a normal 8-hour workday and a 40-hour work week. Several chemical substances have short-term exposure limits or ceiling values which allow a maximum concentration to which workers can be exposed continuously for a short period of time without suffering from (1) irritation, (2) chronic or irreversible tissue damage, (3) narcosis of a sufficient degree to result in accidental injury, impair self-rescue, or substantially reduce work efficiency.

The short-term exposure limit (STEL) is defined by the American Conference of Governmental Industrial Hygienists (ACGIH) and Federal OSHA as a 15-minute time-weighted-average exposure which should not be exceeded within a two hour time period during a workday even if the 8-hour time weighted average is within current limits. Federal OSHA requires that a 15 minute "ceiling" concentration never be exceeded for that chemical constituent. This notation appears as the letter "C" after the chemical name.

Under certain chemical substance listings, there may appear a "skin" notation. This refers to the potential contribution to the overall exposure by the cutaneous route including mucous membranes and eye, either airborne or by direct contact. Little quantitative data is available describing absorption as a function of the concentration to which the skin is exposed Biological monitoring may be considered to determine the relative contribution of dermal exposure to the total dose.

The ACGIH and Federal OSHA have recognized that certain chemical substances may have the potential to be a carcinogen in humans from epidemiological studies, toxicology studies and, to a lesser extent, case histories. Because of the long latency period for many carcinogens, it is often impossible to base timely risk management decisions on the results of such information. categories of carcinogens are designated based upon the most current literature and information. These include confirmed human carcinogens and suspected human carcinogens. chemical categories are recognized to have cancer potential rather than confirmatory proof is based on either 1) limited epidemiologic evidence, experience of clinical reports of single assess, or 2) demonstration of carcinogens in one or more animal species by appropriate methods. The worker potentially exposed to a known human carcinogen must be properly equipped to insure virtually no contact with the chemical constituents. In the case of a suspected human carcinogen, worker exposure by all routes must be carefully controlled by the use of personal and respiratory protection, and administrative or engineering controls.

The following table represents the guidelines currently established by federal OSHA for the materials listed as possible contaminants.

CHEMICAL	OSHA PEL (8 HOUR)	OSHA STEL	OSHA CEILING
METALS			
Arsenic	10 ug/m ³		
Barium	0.5 ug/m^3		
Cadmium	0.2 mg/m^3		0.6 mg/m ³
Chromium	0.5 mg/m^3		
Copper	1 mg/m ³		
Lead	50 ug/m^3		
Mercury	"		$1 \text{ mg}/10 \text{ m}^3$
Selenium	0.2 mg/m^3		
Silver	0.2 mg/m^3 0.01 mg/m^3		
ORGANICS			
Carbon Tetrachloride	e 2 ppm		
1,1 Dichloroethylene			
Methylene Chloride	500 ppm		1,000 ppm
Tetrachloroethylene		200 ppm*	
1,1,1 Trichloroethan			
Trichloroethylene	100 ppm	200 ppm	

^{*} Hour TWA limit recommended by the American Conference of Governmental Industrial Hygienists (ACGIH).

D. AIR MONITORING

Air monitoring for organics and/or metals will be conducted as necessary. NIOSH approved sampling and analytical methods will be used; samples will be analyzed at a laboratory accredited by the American Industrial Hygiene Association (AIHA). Results of personal exposure samples will be used to determine ongoing monitoring frequency.

E. GENERAL WORK PRACTICES

Protective clothing and respiratory protective equipment will be used for various stages of the operation as needed. The level of protection will be specified in the following section depending upon the degree of hazard. (see section 12)

All work being performed at this facility will use the "buddy" system. Prior to beginning the work each day, buddies will be assigned. These team members will keep in visual contact with each other at all times. One member will be responsible to ensure the safety of the other team members. These team members will be aware of any slip, trip, and all lifting hazards along with any potential exposure to chemical substances, heat stress, and general hazards within the work areas. All information regarding work to be performed, emergency procedures, and health and safety hazards will be reviewed before the work begins during

a daily Tailgate Safety meeting. No work will be performed without completing these procedures and appropriate documentation.

All operators of trucks and heavy equipment used on site will be properly trained in the inspection and operation of such equipment. The site supervisor will be responsible to check the proficiency of the operator. One standby person will provide guidance to the equipment operator using either two-way radios or universal hand signals. Perimeter barricades will be placed around the particular equipment used in a fixed location. Audio and/or visual backup alarms will be utilized on all heavy equipment on site.

Only authorized personnel will be permitted in the work area. These authorized individuals must have successfully completed a medical exam and have been properly trained in the use of respiratory protective equipment and specific health and safety hazards. All visitors shall check with the IT representatives in the administrative office, and with the on-site security guard.

Personnel will be prohibited from being transported by any other means than those prescribed for movement of personnel. When trucks or other heavy equipment enters or leaves the site, flagman will direct traffic. This should minimize the possibility of accidents and traffic jams.

Fire extinguishers will be on site. In the event of an emergency, these materials will be ready for the worker's safety and protection. Any deviation from this site safety requirement must be discussed with the Regional Health and Safety Manager.

Smoking will not be permitted on the premises except in the support area or other specified location. Any employee not willing to comply with this procedure will be dismissed from the project immediately.

At least one qualified person competent in both American Red Cross first-aid techniques and cardiopulmonary resuscitation (CPR) will be part of the team performing a specified task. A complete first-aid kit will be readily available on site. If a serious injury occurs, the local hospital and ambulance will be summoned to evacuate the injured or ill person.

No electrical equipment will be permitted in areas where there exist a flammable atmosphere. All static ignition sources will be identified and eliminated by the use of bonding and grounding techniques.

Material Safety Data Sheets (MSDS) will be obtained for every chemical product used on site. This information will be made readily available to all employees upon request and stored in a central location. MSDS or applicable information will be available with regard to materials used in the soil collection and drilling process. All containers of any chemical products will be properly labeled to comply with the Federal OSHA Hazard Communication Standard (29 CFR 1910.1200).

F. HYDROBLASTING SAFETY

Hydroblasting involves a stream of water at 2000 psi, therefore specific safety requirements apply:

- o The operator shall be thoroughly instructed in handling and operating the gun and nozzle and all accessories prior to use.
- o The operator shall wear goggles, faceshield and boots with metatarsal covers.
- o Prior to cleaning piping or vessels, all connecting lines shall be blinded or valved and locked to prevent entry of contaminants.
- o Barricades shall be erected to enclose the work area, and signs shall be posted to warn of high pressure equipment.
- o All components of the hydroblast system shall have a burst pressure at least 4 times the operating pressure.
- o A hose safety shroud shall be used on hoses if operating pressure exceeds 2000 psi.
- o The pressure control shall be a "deadman" type to safely reduce the nozzle discharge pressure when control is released.
- o The pressure discharge gauge shall be clearly visible at all times.
- o A pressure relief device must be installed on the pump and set at 110% of the maximum working pressure of the system.
- o A strainer or filter must be installed on the water supply system to prevent clogging.

G. HEAVY EQUIPMENT OPERATION

- o Only experienced, demonstrably proficient equipment operators will be used to operate such heavy equipment as backhoes, front-end loaders, cranes, etc. Where certification or licensing requirements exist, such personnel shall possess appropriate certification and/or licensing for operating specified heavy equipment.
- o While operating heavy equipment in the work area, the equipment operator shall maintain communication with a designated signalman through either direct voice contact or approved standard hand signals. In addition, all site personnel in the immediate work area shall be made aware of the equipment's operation.
- o All equipment, such as pipe, rubber, etc., shall be kept out of traffic lanes and access ways. Equipment shall be stored so as not to endanger personnel at any time.
- o A flagman with roadwork vest, signs, cones, and highlevel warning signs shall be provided when it is necessary to control normal vehicular traffic due to vehicles entering or leaving the site.

H. FIRE SAFETY

- o Hot work shall not be conducted unless all requirements of ITC PRO 9571.1 (Welding, Cutting, and Other Hot Work in Hazardous Locations) have been met.
- o Equipment on-site shall be bonded and grounded, spark-proof, and explosion resisted, as appropriate.

 Particular attention to bonding/grounding shall be made during transfer of flammable/combustible liquids into vacuum trucks and when ventilation equipment is utilized.
- o A fire extinguisher with a minimum rating of 10B:C shall be strategically located in the area of active work.
- No smoking shall be allowed in the work area.

I. REGULATED AREAS

The work area will include three separate zones: an exclusion ("hot") zone, a contamination reduction zone, and a support zone.

The Exclusion Zone will consist of the entire area of suspected contamination during operations. All employees will use proper personnel protective equipment when working in those areas. The exclusion zone will be a defined area where there is a possible respiratory and/or contact health hazard. In most instances this area will be the incinerator building, with the entrance used to delineate the beginning of the zone. The location of exclusion zone will be identified by cones or other appropriate means.

A <u>Contamination Reduction Zone</u> will be established. Decontamination will be performed in the contamination reduction zone. All personnel entering or leaving the exclusion zone will pass through this area in order to prevent any cross-contamination and for the purpose of accountability. Tools and any equipment or machinery will be decontaminated in a specific location. The decontamination of all personnel will be performed on site adjacent to the exclusion zone. Personal protective outer garments and respiratory protection will be removed in the contamination reduction zone and properly labelled. This zone will be outside the incinerator building.

The <u>Support Zone</u> will consist of an area outside the contamination reduction zone. The support zone will be located to prevent employees from being exposed to any organic vapors, dust or fiber levels above environmental levels. Eating, drinking, or smoking will be permitted in the support area only after washing both face and hands. This zone will be outside the incinerator building, away from the Contamination Reduction zone.

J. MEDICAL SURVEILLANCE

All personnel on-site will have successfully completed a preplacement or periodic (annual) physical examination. This should comply with ITC PRO 9410.1. This examination has been designed to comply with all regulatory requirements.

Pre-employment, Periodic Surveillance, Exit Physicals

Tests that are performed for employment physicals include the following listed:

- Medical and occupation history and past gastrointestinal, hematologic, renal cardiovascular, reproductive, immunological and neurologic problems. Along with a history of respiratory disease and personal smoking habits.
- Blood pressure measurements.
- o Complete blood count and differential to include hemoglobin and hematocrit determinations, red cell indices, and smear of peripheral morphology.

- o Blood urea nitrogen and serum creatinine
- o Urinalysis (dipstick and microscopic examination)
- o Audiometric examination
- o Pulmonary function test (FEV_{1.0} and FVC)
- o SMA-25 or equivalent liver function test
- o EKG for employees over 45 years old or when other complications indicate the necessity
- o Drug and alcohol screen

IT Health and Safety Personnel maintain all employee medical records in the Regional offices. These records are continually reviewed and updated. IT will maintain all medical records for a period of 30 years, and a copy of these records will be made available to any employee for either review or copying upon request. In order to obtain a copy of the medical record, a written release order must be completed by the employee and submitted to the Health and Safety representative.

The medical surveillance provided to the employees includes a judgement by the medical examiner of the ability of the employee to use either positive or negative pressure respiratory equipment. Any employee found to have medical condition which could directly or indirectly be aggravated by exposure to these chemical substances or by the use of respiratory equipment will not be employed for the project.

All part-time employees and all non project personnel visiting the site will be restricted unless evidence is presented that a medical examination covering all the above mentioned tests have been conducted with satisfactory results.

K. TRAINING

All employees assigned to the project will have completed a training program which includes, as a minimum, the following:

o <u>Basic Safety Training</u> - This course stresses the fundamentals of safety including the causes and prevention of slip, trip, and fall hazards, confined space entry, heat and/or cost stress illness and prevention.

- o <u>Hazards and Protection</u> This course deals with the identification and recognition of safe work practices with toxic materials. The use and limitation of applicable protective clothing, respirators, and decontamination procedures. Respiratory fit-test is provided to each employee attending the course.
- o <u>First Aid and CPR</u> It is necessary for some employees in this project group to have completed both first aid and CPR training.
- o <u>Site Specific Safety Training</u> This course covers the mandates of the project health and safety plan. In particular, this stresses emergency response procedures and the various health hazards.
- o <u>Waste Operation Training</u> This coursed is a hands on session with personal protective equipment, drum handling, sampling and decontamination procedures.

Any new employee who has not completed 40 hours of formal training class will receive this training before beginning to work on the project. This will apply to all subcontractors working for IT Corporation.

Tailgate Safety Meetings will be conducted at the beginning of each workshift, or whenever new employees arrive on the jobsite. The health and safety considerations for the particular day's activities will be reviewed, and the protective equipment and other materials necessary to perform the work will be outlined.

L. PERSONAL PROTECTION

LEVELS OF PROTECTION

Specific levels of protection will be used to safeguard IT employees on the job from potential hazards. Three distinct levels of protection may be required for this project. The final determination for IT personnel and subcontractors of any required level of protection will be based upon the hazards and current conditions of the worksite. The only person who may make this determination is the Health and Safety Manager. The situations requiring specific levels of protection are described in the following sections.

LEVEL B PROTECTION

Level B protection will be required when airborne concentrations exceed two times the AGGIH Threshold Limit Valve (TLV) or OSHA PEL. Appreciable air contamination may occur from heavily contaminated soil excavation, requiring this level of protection. Work in areas where concentrations are unknown or may change suddenly also require Level B protection.

The following equipment will be used for Level B protection:

- o Full face air supply respirator (SCBA or Air Line) which is NIOSH/MSHA approved.
- o Hooded, chemical resistant outer suit. Tyvek or polytyvek inner suit.
- o Gloves (outer) chemical resistant (Nitrile)
- o Gloves (inner) chemical resistant (Latex)
- o Boots chemical resistant Neoprene with steel toes with latex booties.
- o Hard hat
- o Hearing protection (if necessary)

LEVEL C PROTECTION

Level C protection will be required when the airborne concentration of suspected contaminants are known to be at or slightly above the ACGIH Threshold Limit Value (TLV) or the OSHA PEL. This level of protection will be utilized during most of the demolition, and when decontaminating tools and equipment.

The following equipment will be used for Level C protection:

- o Full face, air purifying respirators with organic vapor cartridge in combination with high efficiency particulate filter (HEPA) which are NIOSH/MSHA approved. Half face respirators will be utilized if accompanied by chemical splash goggles and specified by the Regional Health and Safety Manager.
- o Hooded, chemical resistant Polyethylene coated TYVEK. Saranex if possibility of wetting exists.
- o Gloves (Outer) chemical resistant Nitrile
- o Gloves (Inner) chemical resistant (latex).
- o Boots (Outer) chemical resistant Neoprene with steel toes or double latex booties where there exist only surface contamination over steel toed shoes.
- o Hard hat
- o Hearing protection (if necessary)

LEVEL D PROTECTION

The minimal level of protection that will be required of IT personnel and subcontractors at the site will be Level D. This level will be utilized in the support zone and other areas remote from the exclusion zone.

The following equipment will be used for Level D protection:

- o Coveralls
- o Boots/shoes safety or chemical protection (latex booties) with steel toes.
- o Safety glasses or goggles
- o Hard hat
- o Chemical resistant nitrile or PVC protective gloves with surgical latex undergloves.

M. RESPIRATORY PROTECTIVE EQUIPMENT AND USE PROTOCOL

A comprehensive respiratory protection program has been established by IT Corporation. This program will be required in all locations where use of such equipment could lessen the potential for adverse health affects to any employee. The type of respiratory equipment will be continuously reevaluated based upon the current level of exposure. The only person who will be able to modify the level of respiratory protection is the regional Health and Safety Manager.

As part of the respiratory training program, each employee will have been instructed in the following elements:

- o Nature of the respiratory hazard on the work site and the appraisal of what may happen if the respiratory protection is not utilized.
- o Use and proper fitting of the respirator.
- o Cleaning, disinfecting, inspection, maintenance, and storage of the respirator.
- o Proper selection, capabilities, and respirator limitations.

The respiratory protection and training program will be conducted, documented, and recorded by the Health and Safety representative.

Routinely used respiratory equipment will be inspected, cleaned, and disinfected daily to help assure proper hygienic practices. A safety equipment custodian shall maintain the respirators. An inspection of these breathing devices will include the following:

- o Examination of the head straps for breaks, loss of elasticity, broken or malfunctioning buckles, and other attachments.
- o Examination of the facepiece for excessive dirt, cracks, tears, distortion, holes, or inflexibility.
- o Examination of the exhalation and inhalation valves for any foreign material, cracks, tears, distortion, in the valve. Additional checks will be made to inspect for proper insertion, defective valve covers, or improper installation.
- o Examination of air purifying elements for incorrect cartridge, expired shelf-life of the cartridge, cracks or dents in the cartridge or cartridge holder.
- o Examination of proper insertion of the cartridges into the facepiece and a check of the gaskets inside the cartridge holder.
- o Examination of air cylinders for adequate air volume. Only grade D air will be utilized for breathing air.

When Level C protection is required, respiratory cartridges will be changed daily. This requirement may be modified by the Health and Safety representative depending upon the exposure level of the air contaminants.

The safety technician will maintain the respiratory equipment and be knowledgeable in the cleaning and disinfection process. Each individual will scrub boots and gloves using detergent in warm water using a brush and then thoroughly rinsing with clear water. Finally, the respirators will be dried in a clean location after each day's use. If broken or malfunctioning parts are found during the cleaning process, these parts will be replaced or new respiratory equipment will be issued to the user.

The respiratory equipment will be stored in an area protected from any mechanical damage. These devices will also be stored in a location that provides protection against dust, heat, excessive moisture, or damage by chemical contact. The storage area for the respirators should be in a readily accessible location.

N. <u>DECONTAMINATION PROCEDURES</u>

PERSONAL DECONTAMINATION

A decontamination zone will be established at the perimeter of the exclusion zone. A step off area will be designated just outside the contamination zone. All employees entering from the exclusion zone will pass through the decontamination area to remove their respirators and/or protective clothing. The employees may then enter the break area after washing their face and hands. Employees must be screened by the "decon person" to ensure compliance with this procedure.

At the end of each work period (before eating, drinking smoking, or leaving the site) each person who has entered the construction area will decontaminate by passing through the contamination reduction line. Each of the following stations will be entered and used as appropriate.

- o Equipment/Tool Drop Station
- o Boot Wash soiled boots will be washed in a tub containing a detergent solution.
- o Boot Wash personnel will step into a tub containing rinse water after washing boots.
- o Glove Wash intact gloves will be wiped clean over a glove was bucket containing detergent and water.
- o Glove Rinse washed gloves will be rinsed with water or wiped with a water wet towel.
- o Used coveralls will be dropped into a bag-lined garbage can for disposal at an approved facility.
- o Spent disposable respiratory or cartridges will be dropped into a bag-line garbage can.
- o Clean boots will be placed under the work table at the clean end of the corridor.
- o Clean respirators, hard hats, goggles and face shields will be placed on the work table at the clean end of the corridor.
- o Personnel may then exit the site through the access control point.

Soiled boots, hard hats, respirators, and other equipment will be inspected daily, washed and scrubbed in a detergent/water solution. After cleaning, equipment will be rinsed thoroughly in water and allowed to dry on a clean surface.

If there is a rip or tear in the employee's protective clothing, that individual will remove the torn garment in the decontamination area and new protective clothing will be issued in order for the employee to return back to work. The same procedure will apply to defective respiratory equipment.

EQUIPMENT DECONTAMINATION

Any equipment used inside the exclusion zone will be considered contaminated and must be cleaned before leaving the work site. Decontamination of all large equipment including generators, backhoes, and other equipment will be performed on site (prior to personnel decontamination). Verification that all equipment has been properly decontaminated will be the responsibility of the site project manager. Proper decontamination may include wipe samples of the surfaces of all equipment. All contaminated solvents generated from the cleaning operation will be collected and containerized for disposal.

SITE SECURITY

Controlled access to the regulated area will be established. Only authorized personnel shall be permitted to enter the regulated area. No one will enter the exclusion or the contamination reduction zones without appropriate authorization. Excavation and sampling operations will be suspended until unauthorized individuals have left the site.

- o All persons entering the regulated area will be equipped with appropriate personnel protective devices.
- o All persons entering the regulated area must be familiar with and abide by the health and safety plan.
- o All persons must have completed the necessary 40-hours training for uncontrolled hazardous waste site operations and emergency response.
- o All employees will sign in and out daily while performing duties on-site. The record of all site entry personnel shall be monitored with the site security officer.

O. HEAT STRESS

Remediation work in protective clothing may result in heat related disorders. One or more of the following control measures can be used to help control heat stress:

o Provision of adequate liquids to replace lost body fluids. Employees must replace water and salt lost from sweating. Employees must be encouraged to drink more than the amount required to satisfy thirst. Thirst satisfaction is not an accurate indicator of adequate salt and fluid replacement.

- o Replacement fluids can be a 0.1 percent salt water solution, commercial mixes such as Gatorade or other product, or a combination of these with fresh water. Employees should be encouraged to salt their foods more heavily.
- o Establishment of a work regimen that will provide adequate rest periods for cooling down. This may require additional shifts for workers.
- o Cooling devices such as vortex tubes or cooling vests and be worn beneath protective garments.
- o All breaks are to be taken in a cool rest area (77 degrees fahrenheit is best).
- o All employees shall be informed of the importance of adequate rest, acclimation, and proper diet in the prevention of heat stress.

During periods of high temperature and/or humidity, the site supervisor or the Health and Safety representative will continually observe the workers for symptoms of heat stress especially in areas where protective clothing is being worn. If the body's physiological process to maintain a normal body temperature fails, or are overburden due to excessive heat exposure, a number of physical reactions can occur ranging from mild symptoms such a fatigue, irritability, anxiety, and decreases in mental concentration. Heat related problems are presented below:

<u>Heat Rash</u> - This caused by continual exposure to heat and humid air, and aggravated by chaffing clothes. Heat rash decreases a person's ability to tolerate heat as well as becoming an irritating nuisance.

<u>Heat Cramps</u> - This is caused by profuse perspiration with inadequate water intake and chemical electrolyte imbalance. This results in muscle spasm and pain in the extremities and abdomen.

<u>Heat Exhaustion</u> - Increased stress on various organs to meet increasing demands to cool the body will result in signs and symptoms including shallow breathing; pale, cool, moist skin; profuse sweating; dizziness and lassitude.

Heat Stroke - This is the most severe form of heat stress which must be treated immediately by cooling the body or death may result. Signs and symptoms include red, hot, dry skin; no perspiration; nausea; dizziness and confusion; strong, rapid pulse; and coma.

P. EMERGENCY RESPONSE PLAN

Emergency response procedures will be developed for extraordinary conditions that may occur at the work site and will be covered during the Tailgate Safety meeting.

GENERAL RESPONSE CONSIDERATIONS

Emergencies must be dealt with in a manner to minimize the health and safety risk to all site personnel. Work activities will be conducted in groups of at least two workers (buddy system) to provide continuous monitoring in the event of an emergency. Emergency signals will be developed to include a continuous 30-second blast of a siren or horn. Other signals will be reviewed such as those developed for restricted air flow or breathing difficulty. A stand-by person will be dressed and ready to assist in the event of an emergency.

FIRE/EXPLOSION

Upon notification of a fire or explosion on-site, the designated emergency signal shall be sounded and all site personnel assembled at the decontamination line. The fire department shall be alerted and all personnel moved to a safe distance from the involved area.

PERSONAL PROTECTIVE EQUIPMENT FAILURE

If any site worker experiences a failure or alteration of protection factor, that person and his/her buddy shall immediately leave the Exclusion Zone. Re-entry shall not be permitted until the equipment has been repaired or replaced.

OTHER EQUIPMENT FAILURE

If any other equipment on-site fails to operator properly, the Project Team Leader and site Safety Officer shall be notified and then determine the affect of this failure on continuing operations on site. If the failure affects the safety of personnel or prevents completion of the Work Plan tasks, all personnel shall leave the Exclusion Zone until the situation is evaluated and appropriate actions taken.

In all situations, when an on site emergency results in evacuation of the Exclusion Zone, personnel shall not re-enter until:

- 1) The conditions resulting in the emergency have been corrected.
- 2) The hazards have been reassessed.
- 3) The site safety plan has been reviewed.
- 4) Site personnel have been briefed on any changes in the Site Safety Plan.

RESPONSIBILITIES

The site project manager will have the responsibility for directing the response activity in the event of an emergency. The responsibilities are described below:

- o Assess the emergency situation and notify site security personnel.
- o Determine the required response measures by informing the site supervisor by radio communication.
- o Notify the appropriate response teams of the specific action that will be taken upon request.
- o Determine and coordinate the on-site personnel actions for the particular emergency situation.
- o Contact and coordinate with any governmental or regulatory agency.
- o Immediately complete the Supervisor Injury Report form upon occurrence of the accident or incident and list on the OSHA Occupational Injury/Illness form 200 if appropriate.

PUBLIC RESPONSE AGENCIES

Before the start of the construction and decontamination operations, the Project Manger will develop a list of public response agencies which may be contacted depending on the nature of the emergency. This list of contact agencies will include the name, address, and telephone number of the following:

0	Police Department		528-4401
0	Fire Department		528-4173
0	Emergency Ambulance		911
0	Poison Control	(212)	764-7667
0	Hartford Hospital		524-2525

In the event of an emergency, an agency may assume authority for the emergency response. Personnel should be instructed to assist the agency in charge. The appropriate contacts include, but not limited to, the following:

o U.S. EPA	(617)	573-9644
o Connecticut DEP		566-2264
o U.S. Coast Guard	(800)	424-8802
o National Response Center	(800)	368-5888
o National Poison Control Center	(404)	588-4400

The list of contacts shall be posted at several prominent locations.

ACCIDENTS AND NONROUTINE EVENTS

The types of emergencies outlined below are not all inclusive and the corresponding response procedures will not be considered inflexible. Every accident presents a unique event that must be dealt with by key trained personnel. The prime considerations are to provide the appropriate initial response to assist those in jeopardy without placing additional personnel at unnecessary risk.

SPILL PREVENTION CONTROL AND CLEANUP COUNTER MEASURE PLAN (SPCC)

Responsible Authority: Site Superintendent

Reporting Authority: OSC

On Site Equipment List Includes

- o Sorbent Pads
- o Sorbent Material
- o Over-Packs
- o HNU Meters
- o Fire Extinguishers
- o Air Horn
- o First Aid Kit
- o Rolls of Polyethylene sheeting
- o Brooms and Shovels
- o Self Contained Breathing Apparatus
- o Protective Clothing
- o Diaphragm Pump
- o Granular Lime

IT's basic approach to any spill or release is:

Control
Contain
Communicate
Clean-Up

In the event of a spill the drum staging area, the spilled material will have already been categorized, therefore, the nature of the material will be known. Based upon this knowledge the appropriate sorbent and/or neutralization material will be applied immediately to control and contain the material. The site superintendent will be notified who will then direct the clean-up operations and perform the required notifications.

If a spill occurs in the "Haz-Cat" area prior to characterization, the on-scene field chemist will determine the appropriate control measures to be initiated immediately. The site superintendent will be notified who will then direct the required clean-up activity.

IT's work plan for this project has been developed incorporating features to prevent and contain the release of any hazardous materials.

VAPOR EMISSIONS

In the event of significant vapor emission, all work shall stop immediately. The source of the emission shall be located and controlled as quickly as possible. State, local and USEPA authorities shall be notified if vapor levels are significant or if vapors leave the site. If a fire or explosion hazard exists, local authorities will be notified.

WORKER INJURY

If a person working in an area is physically injured, American Red Cross first-aid procedures will be followed. Depending upon the severity of the injury or illness, emergency medical response may be obtained accordingly. If the person can be moved, that person will be taken to a location from the work area where emergency first aid treatment an be administered. The local emergency medical facility should be contacted along with an ambulance.

The site project manager will prepare a written report detailing the particular accident, its causes, and consequences within one day from the time of the accident.

PERSONNEL INJURY IN THE EXCLUSION ZONE

Upon notification of an injury in the Exclusion Zone, the designated emergency sinal shall be sounded. All sit personnel shall assemble at the decontamination line. The rescue team will enter the Exclusion Zone (if required) to remove the injured person to the hotline. The Site Safety Officer and Project Team Leader should evaluate the nature of the injury, and the affected person should be decontaminated to the extent possible prior to the movement to the Support Zone. The on-site EMT/or First Aider shall initiate the appropriate first aid, and contact should be made for an ambulance with the designated medical facility (if

required). No persons shall re-enter the Exclusion Zone until the cause of the injury or symptoms is determined.

PERSONNEL INJURY IN THE SUPPORT ZONE

Upon notification of an injury in the Support Zone, the Project Team Leader and Site Safety Officer will assess the nature of the injury. If the cause of the injury or los of the injured person does not affect the performance of site personnel, operations may continue, with the on-site EMT/or First Aider initiating the appropriate first aid and necessary follow-up as state above. If the injury increases the risk to others, the designated emergency signal shall be sounded and all site personnel shall move to the decontamination line for further instructions. Activities on-site will stop until the added risk is removed or minimized.

If the injury to the worker is of chemical nature, the following first-aid procedures will be instituted as quickly as possible:

- <u>Eye Exposure</u> If contaminated material gets into the eyes, the eyes will be flushed immediately at the eyewash station using copious amounts of water while lifting up the lower and upper eyelids.
- o <u>Skin Exposure</u> If contaminated sludge or corrosive liquid material gets on the skin, the affected area will be washed with soap or mild detergent.
- o <u>Inhalation</u> If an individual inhales a volume of toxic or corrosive vapors, the employee will be removed to fresh air at once. If breathing has stopped, artificial respiration will be performed on the affected individual until medical attention can arrive on scene and transport the patient to the nearest medial facility.
- o <u>Ingestion</u> In the event a person ingests a toxic liquid or solid material, medical attention shall be obtained at once.

Q. RECORDKEEPING

All exposure monitoring conducted during the project will be recorded along with the description of the field activities. The recorded results and the methodologies will be kept for a period of at least 30 years.

Records of completed formal health and safety training for any project employee are available upon request. Any health and safety training performed on site or prior to beginning the project will be documented accordingly.

All Tailgate Safety Meetings (daily) will be kept in the form of a log book for review by the Health and Safety Coordinator. Tailgate Safety meetings are conducted prior to the beginning of ever workshift in order to discuss the work activity, potential exposure to various chemicals, physical hazards, type of protective clothing, and miscellaneous items of interest.

All logs and reports required by either local, state, and federal regulations will be kept and submitted accordingly.

APPENDIX H

Safety Meeting Logs

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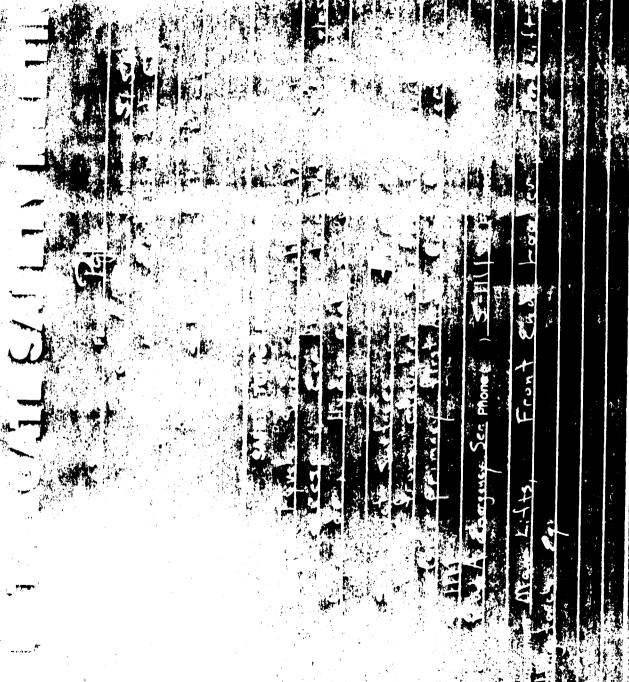
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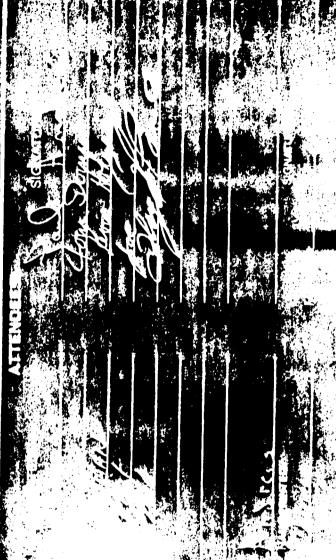
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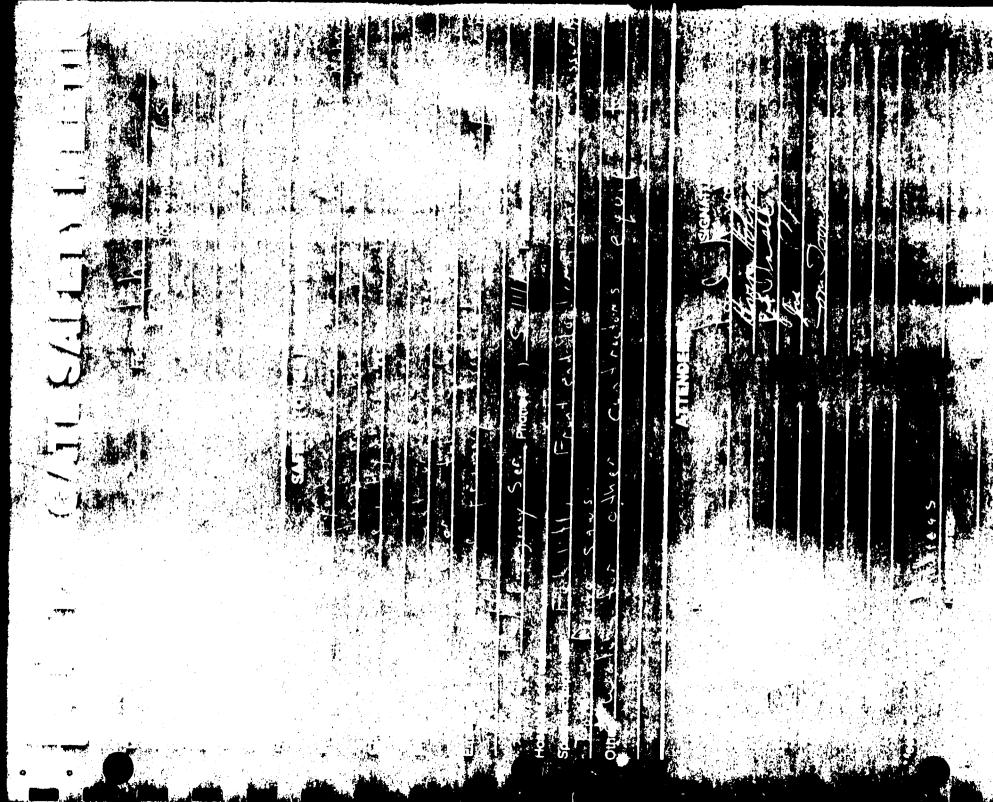
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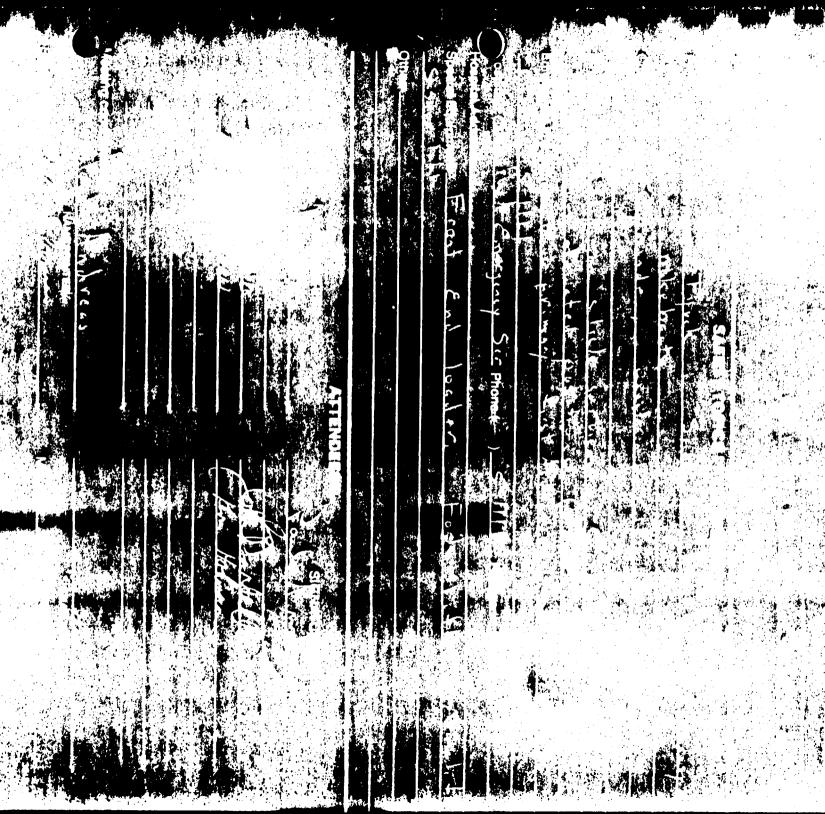
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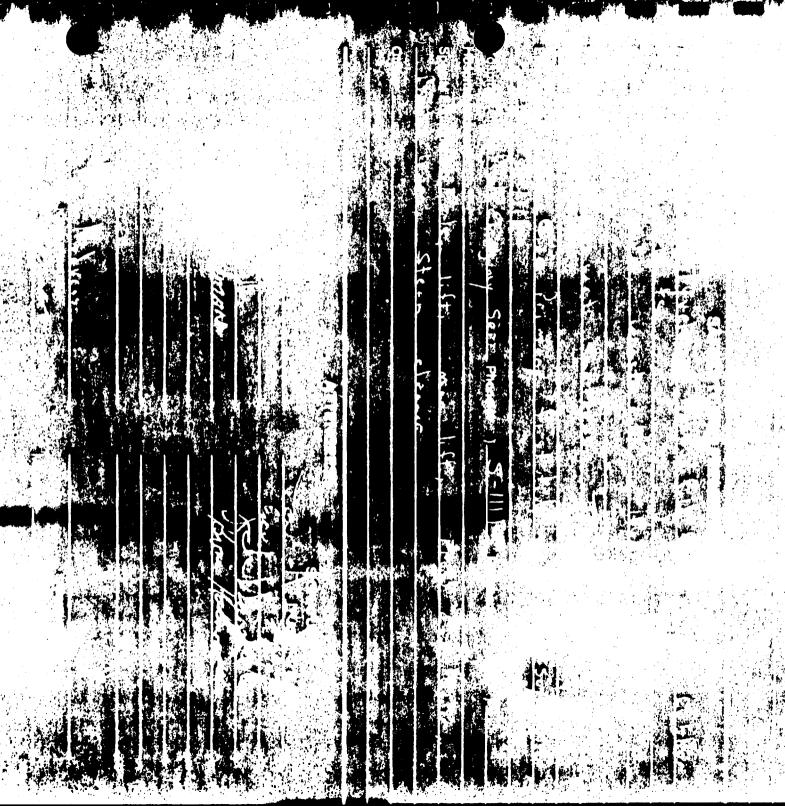
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APPENDIX I

Copies of Manifests

HAZARDOUS WASTE MANIFEST (As Required By The Alabama Department of Environmental Management)

e print or type. (Form designed for use on elite (12-pitch) type	writer.)		Form Approved, O	MB No. 2050-0039. Expires 9-30-91
UNIFORM HAZARDOUS 1. Generator WASTE MANIFEST	's US EPA ID No.	Manifest 2. P Document No.	age 1 Informa	ition in the shaded areas required by Federal
3. Generator's Name and Mailing Address CTD 9	906720810	2063		Sumara Number
PRAIT & WHITNEY (NS 122-16)	- 65100			V46U5T
400 NAIN STREET, EAST HARTFORD, C 4. Generator's Phone () 5. Transporter 1 Company Name 565-3435				
5. Transporter 1 Company Name , 303-3435	6. US EPA ID N	umber	Andporter's Phon	HATA OF
7. Target Late Volton Value 110 17 Call Cal	C 1 D C C C C	omber OUES	leje: Trensporter's	STATE OF THE STATE
9. Designated Facility Name and Site Address	10. US EPA ID N	umber 6.8	tels facility's ID	(401)335-WIZ
CHEMICAL WASTE MANAGEMENT, INC. Emelle Facility	.•	.) -	Jan	
Alabama Highway 17 at Mile Manker 163 Emelle, Alabama 35459	A L D 0 0 0 0 6 2	17	05/652-97	721'' \
11. US DOT Description (Including Proper Shipping Name, Hazar	d Class, and ID Number)	12. Containers	Total	14. Unit Wt/Vo
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RO, HAZARDOUS WASTE, SOLID, N.O. CRN-E NA9189 (P001.P007/PN	.S. (FUCI, PUU7, FUC: [09]nber	gy chalalate		Para Mari
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J. Additional Descriptions for Materials Listed Above		К. Н	endling Codes for	Westee Listed Alsove
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15. Special Handling Instructions and Additional Information		. р		d.
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If I am a large quantity generator, I certify that I have a progra economically practicable and that I have selected the practical future threat to human health and the environment. OR, Fl a	able method of treatment, storage,	or disposal currently a	vallable to me which	h minimizes the present and
the best waste management method that is available to me. Printed/Typed Name				Month Day Yea
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20.Facility Owner or Operator: Certification of receipt of h	azardous materials covered by Signature	this manifest excep	t as noted in Ite	m 19. Month Day Yea
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HAZARDOUS WASTE MANIFEST

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ZARDOUS WASTE MANIFE (As Required By The Alabama Department of Environmental Management) (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039. Expires 9-30-91 1. Generator's US EPA ID No. Information in the shais not required by UNIFORM HAZARDOUS Manifest shaded areas Pocument No. WASTE MANIFEST Generator's Name and Mailing Address CTD99 Ō PRATT & WHITNEY (NS 1229 16) EAST HARTFO: RD, CT US EPA ID Number Designated Facility Name and Site Address US EPA ID Number CHEMICAL WASTE MANAGEMENT, INC. **Emelle Facility** Alabama Highway 17 at Mile Marker 163 205/652-9721 A, L, D, O, O, O, 6, 2, 2, 4, 6, 4 Emeile, Alabama 35459 12. Containers 11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) Total Quantity Wt/Vd No. Type RQ, HAZARDOUS WASTE, SOLID, N.O.S. 1001, FOOT, FOOT, FOOT 52286 0 CWM Profile Number C. CWM Profile Number CWM Profile Number criptions for Materials Listed Above instructions and Work Order #: Purchase Order # 16 GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator. I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford Printed/Typed Name Day Transparer APAN To an Appending of Materials Printed/Typed Name Signature Month Day Year 18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name Signature Month Day Year

19.Discrepancy Indication Space

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20.Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name

Signature

Month Day

TRANSPORTER NO. 2 (or File Copy) (Must Accompany Shipment)



HAZARDOUS WASTE MANIFEST

rse print or type. Form designed for use on elite (1	equired by The Alabama Dep. (2-pitch) typewriter.)	ariment of Envi		-	2050-0039. Expires 9-30-91
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3. Generator's Name and Maifing Address PRATT & WHITNEY (NS 122-	C+099067208	10206	Civi	MAE 47	3055
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16 GENERATOR'S CERTIFICATION. I hereby di proper shipping name and are classified, packe according to applicable international and nation	d, marked, and labeled, and are in all responding government regulations.	ects in proper conditi	en for tr ansp or	t by highway	4
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HAZARDOUS WASTE MANIFEST

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TRANSPORTER NO. 2 (or File Cody) (Must Accompany Shipment)

APPENDIX J

Copies of Receipts

Profit centers 65	5 🐇	RECEIF	T TICKET	m A	Numbe	r:\ C \ \	56739
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fix Ratio: / (Flue Dust) (Wi	Bate)	D	ensity:	Та	nker Only)		
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	NSPORTER NAME RUCK NUMBER	E: SUTTLES		08:14	12/0 6/80	SS: 40840 LB	
	RAILER NUMBER	FB -FLAT	BEDS 1	4:54 12/0	6/89 NET		
R	ec Work Order eq Number	Manifest Number	Profile Number	Federa Waste		Generator Name	Wste Clse
0	1 8912 <i>0</i> 5008-03	3 <i>00004760</i> 53-01	J522860HM	CHK REST	RICTION (JNITED TECHNOLOG	[ES 52
			••				
				500	"× 9	01×491	- 7 - 6
						(金) (本) (本) (本) (本) (本) (本) (本) (本) (本) (本	
					,		
	OMMENTS:						
		, 			Time:		
	3 Waste:	<u>Sample</u> D81/T45-D81		sposal Metho		an:	
	Ratio: /	(Circle One) (Waste)		ensity:		nker Only)	
	sh Pad Release:	Signature	Re	eleased For D	isposal By:	Signature	_ :

					117	
Profit Contart, 695	RECEIP	T TICKET	MO	Number		57323
STHERE EL DUTE: 12-11-89		*		TIME IN: SCHEDULED T		74: 32 ^{:1}
INSPORTER NAME PREEHOLD			apasi	, en		
TRUCK NUMBER TRAILER HUMBER 24	1	04:36 12:13 12/1	12/11/89 1/89 TARE		LB	
LOAD TYPE: R -ROLL	OFF		NET	:18820		1
Rec Work Order Manifest Seq Number Number				Generator	Name	Wate Clse
01 891211061-02 0000476055-0)1 J522860HM	CHK RESTR	TCTION U	VTTED TECHN	ni goies	5 52
				700 F 100 F		<i>,</i> ——
_				•	` #	<u>-</u>
				· · · · · · · · · · · · · · · · · · ·	.	
			7,	, .		
				•	3	
<u>−</u> 1 · · · · · · · · · · · · · · · · · · ·	<u>.</u>	- ,				
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COMMENTS:						
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			**	in all the special residence (in the second		
J					,	
Approvals:			Time:			
CB Waste: Samp						
C						
Vix Ratio: / (Flue Dust) (Waste)	De	ensity:	(Tank	ter Only)		
Nash Pad Release:	R	eleased For Dis	sposal By: 💄	····		
Bulk Only) Signature			•	Signature		

	· · · · · · · · · · · · · · · · · · ·				
6 95 •/	REC	IPT TICKET	11	3 Numbe	r: 57
12-11-89		DZ		TIME IN:	01
	`			SCHEDULED	TIME:
FREEHOLD			GRO:	5 5:	
		01:38	12/11/89 TARI	60300 E :	LB
R -ROLL-	-OFF	11:23 12/1	1/89 NEI	38420 LB	_
	_			21,980)
Manifest Number				Generator	Name
		ه الله الله الله الله الله الله الله ال		, est en	
0000476056-01	1 J522860	OHM CHK RESTR	ICTION (UNITED TECH	NOLOGIES
				,	
			•)
					*
			es.		~ -
			* *		
		,		•	
		·			
		- -			
			Time:		
	ler:		Technic		
D81/T45-D81		Disposal Method			
	R -ROLL- Manifest Number 0000476056-0	12-11-89 12-11-89 R -ROLL-OFF Manifest Profil Number Number 0000476056-01 J522860	PRECHOLD O1:38 R -ROLL-OFF 11:23 12/1 Manifest Profile Federal Number Number Waste S O000476056-01 J522860HM CHK RESTR	12-11-89	TIME IN: SCHEDULED GROSS: 01:38 12/11/89 60300 TARE R -ROLL-OFF 11:23 12/11/89 NET 38420 LB Manifest Profile Federal EPA Generator Number Number Waste Status 0000476056-01 J522860HM CHK RESTRICTION UNITED TECH

APPENDIX K

Copies of Disposal Certificates



Emelle Facility
P. O. Box 55
Emelle, Alabama 35459
205/652-9721

Pratt & Whitney (MS 122-16) 400 Main St. East Hartford, CT 06108

EPA ID NUMBER: ALD000622464

CERTIFICATE OF COMPLIANCE AND DISPOSAL

Chemical Waste N	Management, Inc., ha	s received Waste			• -
material from	Pratt & Whitney				
described on Alab	ama Hazardous Was	te Manifest numb	er CWMA		. :
476051	Chemical Wa	iste Management,	Inc.,	,	
hereby certifies the	at Waste material rec	ceived on	~. .,		
the 5th	day of _	December		_, 198 <u>9</u>	was
disposed of in con	noliance with State a	nd Federal regula	tions		

Glory McAboy, Document Control Supervisor February 16, 1990



Emelie Facility P. O. Box 55 Emelie Alabama 35459 205/652-9721

Pratt & Whitney (MS 122-16) 400 Main St. East Hartford, CT 06108

EPA ID NUMBER: ALD000622464

CERTIFICATE OF COMPLIANCE AND DISPOSAL

Che	mical Waste M	anagement, Inc., has	received Waste		٠ ـ
mate	erial fromF	ratt & Whitney			
desc	cribed on Alaba	ıma Hazardous Waste	Manifest number CWMA		; ;
	476052	Chemical Was	te Management, Inc.,		
here	by certifies tha	t Waste material rece	ived on		
the -	5th	day of	December	, 198 <u>_</u>	was
disno	nsed of in com	nliance with State and	d Federal regulations		

Glory McAboy, Document Control Supervisor February 16, 1990



Emelie Facility
P. O. Box 55
Emelie, Alabama 35459
205/652-9721

Pratt & Whitney (MS 122-16) 400 Main St. East Hartford, CT 06108

EPA ID NUMBER: ALD000622464

CERTIFICATE OF COMPLIANCE AND DISPOSAL

Chem	ical Waste Ma	nagement, Inc., has	received Waste		-
mater	ial fromPra	att & Whitney			
descri	ibed on Alabar	na Hazardous Waste	Manifest number CWN	1A	•
	476053	Chemical Wast	e Management, Inc.,		
hereb	y certifies that	Waste material recei	ved on		
the _	6th	day of	December	, 198 <u>9</u>	was
dispos	sed of in comp	liance with State and	l Federal regulations		

Glory McAboy, Document Control Supervisor

February 16, 1990



Emelle Facility
P. O. Box 55
Emelle, Alabama 35459
205/652-9721

Pratt & Whitney (MS 122-16) 400 Main St. East Hartford, CT 06108

EPA ID NUMBER: ALD000622464

CERTIFICATE OF COMPLIANCE AND DISPOSAL

Cher	mical Waste Ma	nagement, Inc., has	received Waste			· -
mate	erial from Pra	tt & Whitney				
desc	ribed on Alabar	na Hazardous Was t	e Manifest number CWMA			æ ÷ ₹
	476055	Chemical Was	ste Management, Inc.,		ŗ	
here	by certifies that	Waste material rece	eived on			
the _	11th	day of	December	, 198 _ 9		was
dien	seed of in comp	liance with State an	d Federal regulations			

Glory McAboy, Document Control Supervise February 16, 1990



Chemical Waste Management, Inc. Emelle Facility

Emelle Facility
P. O. Box 55
Emella, Alabama 35459
205/652-9721

Pratt & Whitney (MS 122-12) 400 Main St. East Hartford, CT 06108

EPA ID NUMBER: ALD000622464

CERTIFICATE OF COMPLIANCE AND DISPOSAL

Chei	mical Waste Ma	anagement, Inc., has received Waste		• -
mate	erial from Pr	ratt & Whitney		
desc	ribed on Alaba	ma Hazardous Waste Manifest number CW	/MA	. •
	476056	Chemical Waste Management, Inc.,		
here	by certifies that	t Waste material received on		
the -	11th	day of	, 198 _9	was
dispo	osed of in comp	pliance with State and Federal regulations.		

Glory McAboy, Document Coat of Supervisor February 16, 1990

APPENDIX L

Sampling Logs



DATE	1	2		,	7		3	9
TIME	_{\[\]		2	,	0		Ç	
PAGE OF								
PAGE								
PROJE	СТ	N	Ο.					

PROJECT NAME		
SAMPLE NO. J2191		
SAMPLE LOCATION WFL A	Brent oil	· · · · · · · · · · · · · · · · · · ·
SAMPLE TYPE WATER	CONTAINERS	AMOUNT
COMPOSITE YES X NO	USED	COLLECTED
COMPOSITE TYPEN/A		
DEPTH OF SAMPLENA		
WEATHER		
COMMENTS: Started flushing at 11 sample collected at 15 had pass thru the line	:57 2:06 ofter	about 25 gullons
water looked clear	•	

PREPARED BY:



DATE	(2	0	7	8	9		
TIME								
PAGEOF								
PAGE		T						
PROJE	ECT	NO) .					

PROJECT NAME Pratt + Whitney		
SAMPLE NO		
SAMPLE LOCATION WFL # 2 A +	WFL 4A	
SAMPLE TYPE WATER	CONTAINERS USED	AMOUNT COLLECTED
COMPOSITEYES _X_NO _	·	
COMPOSITE TYPE		
DEPTH OF SAMPLE		
WEATHER		
comments: started flushing at 15 sample collected at had flowed throw line	2:07 12:15 15 -	after 25 gallon
WFC 4A collected	e 12:18	(PUP)

PREPARED BY: _____



DATE	1	2	Ju	F	}	8	9		
TIME	L		2	2	2	8	<u> </u>		
PAGEOF									
PAGE		I			\int				
PROJE	PROJECT NO.								

PROJECT NAME Prof + Whitzey		
SAMPLE NO		
SAMPLE LOCATION WFL 3 A		
SAMPLE TYPE WATER	CONTAINERS USED	AMOUNT COLLECTED
COMPOSITEYES _X_NO		
COMPOSITE TYPE		
DEPTH OF SAMPLE		
WEATHER		
COMMENTS: started flushing e Souther collected at 1: had ussed thro line.	12:20 2:28 after -	vzs gullons
had ussed thro line.		J

PREPARED BY:



DATE	1	2	-	J	7	. [3	9
TIME	1			1	5	-	7)
PAGEOF								
PAGE		I						
PROJECT NO.								

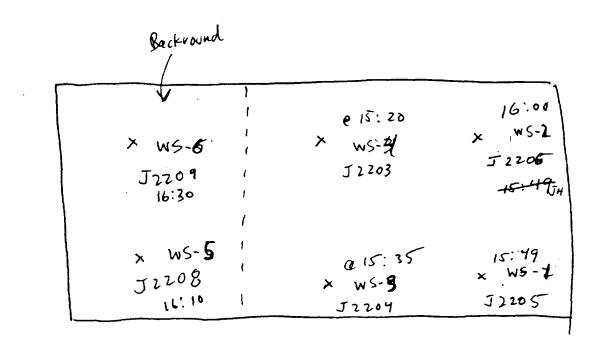
PROJECT NAME Pratt + Witney		
SAMPLE NO. J 2190		
SAMPLE LOCATION 1N FLUENT A		
SAMPLE TYPE WATER	CONTAINERS USED	AMOUNT COLLECTED
COMPOSITEYESX_NO		
COMPOSITE TYPE		
DEPTH OF SAMPLE N/A		
WEATHER Cold , clear		
/		
comments: water was allowed prior to sampling.	to run for	5 min.
prior to sampling.		



DATE	1	2	٥	7	4	8	9
TIME							
PAGE OF							
PAGE					_	T	
PROJECT NO.							

PROJECT NAME Pratt + Whitney		
SAMPLE LOCATION Cieling of Incine	exists bilding	
SAMPLE TYPE WIPE	CONTAINERS	AMOUNT COLLECTED
COMPOSITE YES X NO	802 9/955	3 pads
DEPTH OF SAMPLE		- 123
WEATHER		

COMMENTS:



J2Z07 Field Blank C 15:40

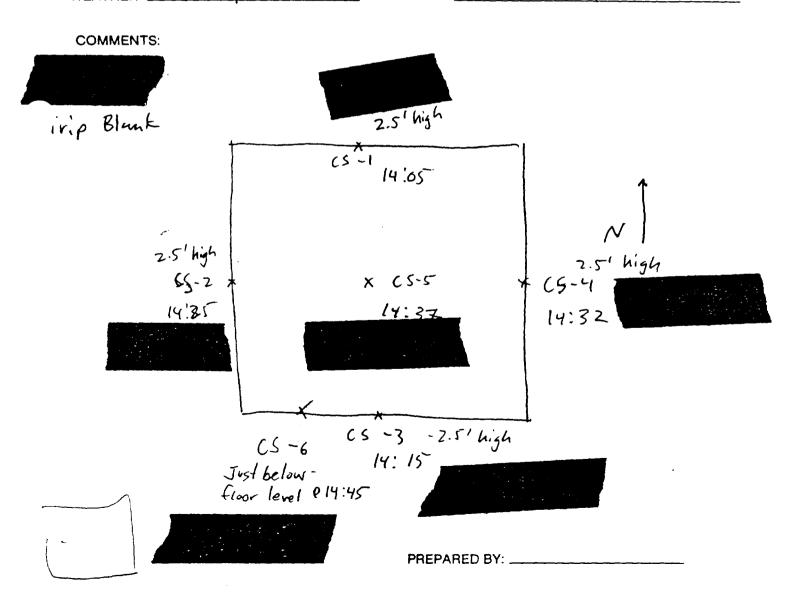
Travel blank
J2210

PREPARED BY: _____



DATE	ł	2	_	0	7	-	8	9
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PAGE		I					7	
PROJECT NO.								

PROJECT NAME fratt + Whitzey	···	
SAMPLE LOCATION Pit Area for air	scrubber.	
SAMPLE TYPE <u>Concrete chip</u> COMPOSITE <u>YES</u> NO	CONTAINERS USED	AMOUNT COLLECTED
COMPOSITE TYPE	902 glass	~10g.
WEATHER		





CHAIN-OF-CUSTODY RECORD

R/A Control No. 11 306

 $\hbox{C/C Control No. } 161.972$

PROJECT NAME/NUMBER	Prott + Whiley	LAB DESTINATION Arrill Labs
SAMPLE TEAM MEMBERS _	Juiques Hill	CARRIER/WAYBILL NO.

Sample Number	Sample Location and Description	Date and Time Collected	Sample Type	Container Type	Condition on Receipt (Name and Date)	Disposal Record No.
52140	InCluent A	12-7-84	WAILR			
72171	WFL-1 A					
17172	WF1-2 A					
17173	WF1-3 A					
12194	WFL-4 A	J. 3. 3.	1			
J2195	Travel Blank	1	14	40ml Vovial		
72196	(5-1	12-1-89 14.05	Emeratechip	8 809 91055		
コッパチ	(5.7	12 799 14.25				
J2118	(4-3	14.75				
J2199	(5-4)	19.32	4	↓		

Special Instructions:		
Possible Sample Hazards:		
SIGNATURES: (Name, Company, Date and Time)		
1. Relinquished By: Received By: Company, Date and Time) 1. Relinquished By:	3. Relinquished By:	
Received By: Sauta W. Sun!	Received by:	
2. Relinquished By:	4. Relinquished By:	
Received By:	Received By:	



CHAIN-OF-CUSTODY RECORD

R/A Control No. 307

C/C Control No. 161970

PROJECT N	IAME/NUMBER Profit Whelmo	LAB DESTINATION ANEXIL Cab.					
SAMPLE TE	AM MEMBERS Jaigino Hill	/1 1	_ CARRIER	/WAYBILL NO	i		
Sample Number	Sample Location and Description	Date and Time Collected	Sample Type	Container Type	Condition on Receipt (Name and Date)	Disposal Record No.	
17700	(5-5	11-7-99 14:37	clup	807 91655			
17701	(5.6	14.42	chip	902 5 1955			
77202-	Trop Blenk for chaps		JUATER -	VOVIACS			
J1103	(W4.4	15.20.	WIPE :	Sua glass			
J2704	(W\$-3	15.35		B			
12205	c w % - 1	10:49					
J2706	C W4-2	16,00	*				
17707	WIPF SAMPLE FIELDBlunk	15:40					
7 2708	C W3-5	16:10					
J1709	C W/ 6	16:30	1				
Special Instr	uctions:	,					
•	mple Hazards:				,		
SIGNATURI	ES: (Name, Company, Date and Time)				3	•	
1 Relinquis	hed By: ////	12/7/85e 17.	· 47 3. Reling	uished Bv:			
	bed By: By: When By: Wh	: 81					
Heceived	By: January		_ Heceiv	eu by:	······································		
2. Relinquis	hed By:		_ 4. Relinq	uished By:			
Received	By:		_ Receiv	ed By:			

INTE CHE	RNATIONAL HNOLOGY PORATION		REQUEST (i ANALY	SIS		ntrol No. 17 77 ntrol No. 161 73
PROJECT NAME Prutt + Whitney			DATE SAMPLES SHIPPED		$\frac{12}{7}$	189	
PROJECT NUM				LAB DES	TINATION	Nuev	ill Calis
PROJECT MAN	AGER	1 Conser		LABORA	TORY CONTACT	Jan	ie Palain
BILL TO	_ fra	ill & Wlu-troy		SEND LA	B REPORT TO	_Scut	1 Singer
		-				- /	
	<u></u>						
PURCHASE OR	DER NO.			DATE RE	PORT REQUIRE		
				PROJEC [*]	T CONTACT	500	11 Singer
				PROJEC	T CONTACT PHO	ONE NO	
Sample No.	Sample Type	Sample Volume	Preserve	ative	Requested	Testing Program	Special Instructions
31700	whip	807	N D		VO's, C	N. Molal	
52201	Chip	* 307			VO's, (N, Molals		
37202	WATER	2×40ml			402	-	
72203	WIPE	3 pads	HNOZ, NO	HOOM, HOO	VUS , CI	V, Molals	
J2204				,			
J2205							
J7206							
J1207							
J1208							
J1209	7	▼		7	4 4	<u> </u>	
TURNAROUND TIE	ME REQUIRED: (Rush m	nust be approved by the Pro	ject Manager.)				•
	Normal		Rush	(Subject to r	ush surcharge)		
POSSIBLE HAZAR	D IDENTIFICATION: (P	ease indicate if sample(s) ar	re hazardous materials	and/or suspect	ed to contain high lev	vels of hazardous substance	es)
Nonhazard	Flamr	nable	Skin irritant		Highly Toxi	c	Other
							(Please Specify)
SAMPLE DISPOSAL	(Please indicate disposition	of sample following analysis. Lat	b will charge for packing,	shipping, and disp	oosal.)		
	Return to Client	Disposal by Lab					
FOR LAB USE ONL	_Y Receive	o By Hantall	South		Date/Time		

WHITE - Original, to accompany samples YELLOW - Field copy

'NTE ECH ORI	RNATIONAL INOLOGY PORATION		REQUES'	R ANALY	'SIS	R/A Con C/C Con	trol No. 17 306 trol No. 16 , 17 2
PROJECT NAM	E Proff +	Whitney		DATE SA	AMPLES SHIPPED	17/7	· ·
PROJECT NUM			·····	LAB DES	STINATION	1001.11	Labs
PROJECT MANA	AGER Soft	Singer		LABORA	TORY CONTACT		
BILL TO	<u>fiutl</u>	1 Whitey		SEND LA	AB REPORT TO	Scott	Singer
		7.0.1 1100					
PURCHASE OR	DER NO			DATE RE	EPORT REQUIRED		
				PROJEC	T CONTACT		
				PROJEC	T CONTACT PHO	NE NO	
Sample No.	Sample Type	Sample Volume	Preser	vative	Requested T	esting Program	Special Instructions
J 2190	WATER		isneeded		you metal	yavide	
37141							
77142							
J7193			<u>, ;</u>				
J7194			4	-	4		
37155	4	2x 40ml	N 0		y 0'i		
J7196	convele the	302	V 9		Vo's ne-la	11s cyanida	· · · · · · · · · · · · · · · · · · ·
J7157	,				,	, ,	M-7.
J2198							
J7199	<u> </u>	P	7		→	7	
TURNAROUND TIE	·	nust be approved by the Project	ct Manager.)	. (Subject to	rush surcharge)		
POSSIBLE HAZARI	DIDENTIFICATION: (P	lease indicate if sample(s) are	hazardous material	s and/or suspec	ted to contain high leve	els of hazardous substance	3)
Nonhazard	Flami	mable	Skin Irritant		Highly Toxic		Other(Please Specify)
SAMPLE DISPOSAL:	(Please indicate disposition	of sample following analysis. Lab v	will charge for packing	, shipping, and dis	sposal.)		
	Return to Client	Disposal by Lab		·			
FOR LAB USE ONL	Y Receive	d By Jant W.	Truth		Date/Time		
WHITE - Original to	accompany samples	V '					

WHITE - Original, to accompany samples YELLOW - Field copy

APPENDIX M

Raw Analytical Data

ENVIRONMENTAL LABORATORY INC

Lawton S. Averill, Director

CT Public Health Lab No. PH-0513

REPORT ON LABORATORY EXAMINATIONS

To Client:

Pratt & Whitney

East Hartford, Ct. 06108

Date: December 15, 1989

SAMPLE DATA:

Collected By:

IT Corp.

Jacques Hill

SAMPLE NO.	DESCRIPTION OF SAMPLE				
	Rinsate samples collected and received 12/7/89 from Pratt & Whitney, East Hartford, Ct., for hazardous waste incinerator closure plan analysis.				
289-26-2672 289-26-2673 289-26-2674 289-26-2675 289-26-2676	IT Sample No. J2190, Influent A IT Sample No. J2191, WFL-1A IT Sample No. J2192, WFL-2A IT Sample No. J2193, WFL-3A IT Sample No. J2194, WFL-4A				

LABORATORY FINDINGS:

(milligrams per liter, mg/l, except as noted)

	-	289-26-2676
	1 0 01	
6	2 0.01 0.01 2 0.006 2 0.01 2 0.01 0.09 2 0.01 2 0.001 2 0.01 2 0.01 2 0.005	/ 0.01 / 0.006 / 0.01 / 0.01 / 0.09 / 0.01 / 0.001 / 0.02 / 0.01 / 0.01 0.21 0.18
)	20.01 20.006 20.001 20.01 20.01 20.001 20.001 20.001 20.001 20.001 20.001 20.001 20.001 20.001 20.001 20.001	20

cc: Pratt & Whitney
 Attn: Scott Singer

The Averill Environmental Laboratory, Inc.

FAX (203) 747-9264 ENVIRONMENTAL LABORATORY INC

Lawton S. Averill, Director

CT Public Health Lab No. PH-0513

REPORT ON LABORATORY EXAMINATIONS

To Client:

Pratt & Whitney

East Hartford, Ct. 06108

Date: December 15, 1989

SAMPLE DATA:

Collected By:

IT Corp.

Jacques Hill

SAMPLE NO.	DESCRIPTION OF SAMPLE					
	Rinsate samples collected and received 12/7/89 from Pratt & Whitney East Hartford, Ct., for hazardous waste incinerator closure plan analysis.					
289-26-2673 289-26-2674 289-26-2675	IT Sample No. J2190, Influent A, analyzed 12/8/89. IT Sample No. J2191, WFL-1A, analyzed 12/10/89. IT Sample No. J2192, WFL-2A, analyzed 12/8/89. IT Sample No. J2193, WFL-3A, analyzed 12/10/89. IT Sample No. J2194, WFL-4A, analyzed 12/10/89.					

LABORATORY FINDINGS:

(parts per billion, ppb, except as noted)

AVALVEIS 500			SAMPLE NO.		
ANALYSIS FOR	289-26-2672	289-26-2673	289-26-2674	289-26-2675	289-26-2676
Methylene chloride	ND	58 CB	ND	ND	ND
1,1-Dichloroethene	ND	ND	ND	ND	ND
1,1,1-Trichloroethane	ND	12 CB	22	ND	16 CB
Carbon Tetrachloride	ND	ND	ND.	ND	ND
Trichloroethene	ND	122	ND	ND	ND
Tetrachloroethene	ND	48	3400	ND	3700
	ND Z5 ppb	ND ∠5 ppb	ND Z10 ppb	ND 25 ppb	ND <u>∠</u> 10 ppb
					20

CB - The results of the analysis have been corrected for the presence of the compound in the blank.

cc: Pratt & Whitney - Scott Singer

The Averill Environmental Laboratory. Inc

ENVIRONMENTAL LABORATORY INC

Lawton S. Averill, Director

CT Public Health Lab No. PH-0513

REPORT ON LABORATORY EXAMINATIONS

To Client:

Pratt & Whitney

East Hartford, Ct. 06108

Date: December 15, 1989

SAMPLE DATA:

Collected By: IT Corp.

Jacques Hill

SAMPLE NO.	DESCRIPTION OF SAMPLE				
	Rinsate sample collected and received 12/7/89 from Pratt & Whitney, East Hartford, Ct., for hazardous waste incinerator closure plan analysis				
289-26-2677	IT Sample No. J2195, Travel Blank, analyzed 12/8/89.				
	•				

LABORATORY FINDINGS:

(Parts per billion, except as noted)

ANALYSIS 500		SAMPLE NO.			
ANALYSIS FOR	289-26-2677				
Methylene Chloride	ND				
1,1-Dichloroethene	ND				
1,1,1-Trichloroethane	ND				
Carbon Tetrachloride	ND	.			
Trichloroethene	ND				
Tetrachloroethene	ND				
	ND Z1 ppb				
			0		

CB - The results of the analysis have been corrected for the presence of the comin the blank.

ENVIRONMENTAL LABORATORY INC

Lawton S. Averill, Director

CT Public Health Lab No. PH-0513

REPORT ON LABORATORY EXAMINATIONS

To Client:

Pratt & Whitney
East Hartford, CT 06108

Date: December 15, 1989

SAMPLE DATA:

Collected By: Jacques Hill, IT Corporation

SAMPLE NO.	DESCRIPTION OF SAMPLE
289-26-2685 289-26-2686 289-26-2687	Wipe samples collected and received 12/7/89 from Pratt & Whitney, East Hartford, CT, for hazardous waste incinerator closure plan analysis. IT Sample No. J2203, CW-4 IT Sample No. J2204, CW-3 IT Sample No. J2205, CW-1 IT Sample No. J2206, CW-2 IT Sample No. J2207, Field Blank

LABORATORY FINDINGS:

Results are in ug/wipe area

		SAMPLE NO.					
ANALYSIS FOR	289-26-2684	289- 26-2685	289-26-2686	289-26-2687	289-26-2688		
Arsenic Barium Cadmium Chromium, Total Copper Lead Mercury Nickel Selenium Silver Cyanide, Total	11 ALL 6.5 3.0 2.5 14 20.05 25.0 20.50 20.25 20.25	12 DVER RANGE 7.5 4.0 ∠2.5 14 ∠0.05 ∠5.0 ∠0.50 ∠2.5 ∠0.25	11 > 14.000 8.0 4.0 2.5 19 20.05 25.0 25.0 20.50 22.5 20.25	10 8.0 4.0 4.0 2.5 13 4.0.05 4.5.0 4.0.50 4.2.5 4.0.25	9.5 9.0 5.0 2.5 26 \angle 0.05 \angle 5.0 \angle 0.50 \angle 2.5 \angle 0.25		
				0/			

cc: Pratt & Whitney
 Att: Scott Singer

The Averill Equipmental Laboratory Inc.

ENVIRONMENTAL LABORATORY INC

Lawton S. Averill, Director

CT Public Health Lab No. PH-0513

REPORT ON LABORATORY EXAMINATIONS

To Client:

Pratt & Whitney

East Hartford, CT 06108

Date: December 15, 1989

SAMPLE DATA:

Collected By: Jacques Hill, IT Corporation

SAMPLE NO.	DESCRIPTION OF SAMPLE
289-26-2685 289-26-2686 289-26-2687	Wipe samples collected and received 12/7/89 from Pratt & Whitney, East Hartford, Ct, for hazardous waste incinerator closure plan analysis. IT Sample #J-2203, CW-4 IT Sample #J-2204, CW-3 IT Sample #J-2205, CW-1 IT Sample #J-2206, CW-2 IT Sample #J-2207, Field Blank

LABORATORY FINDINGS:

Results are in ug per Wipe Area

AVAL MELE 500	SAMPLE NO.					
ANALYSIS FOR	289-26-2684	289-26-26 85	289-26-2686	289-26-2687	289-26-2688	
Methylene Chloride 1,1-Dichloroethene 1,1,1-Trichloroethane Carbon Tetrachloride Trichloroethene Tetrachloroethene	ND ND 0.13 ND ND 0.40	ND 0.76 ND ND 0.005 0.96	ND ND 0.57 ND ND 0.29	ND 0.14 0.53 ND ND 0.55	0.49 ND 0.66 ND ND 0.21	
ND ∠0.05				0/		

cc: Pratt & Whitney
Att: Scott Singer

Lauten Selxul

Lawton S. Averill, Director

CT Public Health Lab No. PH-0513

REPORT ON LABORATORY EXAMINATIONS

To Client:

Pratt & Whitney

East Hartford, CT 06108

Date: December 15, 1989

SAMPLE DATA:

Collected By: Jacques Hill, IT Corporation

SAMPLE NO.	DESCRIPTION OF SAMPLE		
	Wipe samples collected and received 12/7/89 from Pratt & Whitney, East Hartford, Ct, for hazardous waste incinerator closure plan analysis. IT Sample No. J2208, CW-5 IT Sample No. J2209, CW-6		

LABORATORY FINDINGS:

Results are in ug/wipe area

Arsenic Barium Cadmium Copper Lead Mercury Nickel Selenium Silver Cyanide, Total 289-26-2689 289-26-2690 9.5 9.5 ALL OVER RANGE; > 14,000 7.5 8.0 4.5 3.5 4.5 3.5 4.5 10 11 4.0.05 4.0.05 4.0.05 4.0.05 4.0.50 4.0.50 4.0.50 4.0.50 4.0.50 4.0.50 4.0.50 4.0.25	ANALYSIS FOR		SAMPLE NO.			
Barium ALL OVER RANGE; > 14,000 Cadmium 7.5 8.0 Chromium, Total 4.5 3.5 Copper ∠ 2.5 ∠ 2.5 Lead 10 11 Mercury ∠ 0.05 ∠ 0.05 Nickel ∠ 5.0 ∠ 5.0 Selenium ∠ 0.50 ∠ 0.50 Silver ∠ 2.5 ∠ 2.5	ANALYSIS FOR	289-26-2689	289-26-2690			
	Barium Cadmium Chromium, Total Copper Lead Mercury Nickel Selenium Silver	ALL OVER RA 7.5 4.5 2.5 10 6.05 6.50 6.50 6.2.5	NGE; > 14, 8.0 3.5 ∠2.5 11 ∠0.05 ∠5.0 ∠0.50 ∠2.5	000		

cc: Pratt & Whitney Att: Scott Singer

The Averill Environmental Laboratory, Inc.

ENVIRONMENTAL LABORATORY INC

Lawton S. Averill, Director

CT Public Health Lab No. PH-0513

REPORT ON LABORATORY EXAMINATIONS

To Client:

Pratt & Whitney

East Hartford, CT 06108

Date: December 18, 1989

SAMPLE DATA:

Collected By: Jacques Hill, IT Corp.

SAMPLE NO.	DESCRIPTION OF SAMPLE
	Concrete chip samples collected and received 12-7-89 from Pratt & Whitney, East Hartford, CT for hazardous waste incinerator closure plan analysis.
289-26-2679 289-26-2680 289-26-2681	IT Sample No. J 2196, CS-1 IT Sample No. J 2197, CS-2 IT Sample No. J 2198, CS-3 IT Sample No. J 2199, CS-4 IT Sample No. J 2200, CS-5

LABORATORY FINDINGS:

(milligrams per liter, mg/1, except as noted)

		SAMPLE NO.			
ANALYSIS FOR	289-26-2678	289-26-2689	289-26-2680	289-26-2681	289-26-2682
pH, 10% Slurry Total Solids, percent	10.6 98.6	11.2 98.1	10.9 98.0	10.8 98.3	11.7 97.0
Tests are mg/kg, (ppm), based on Dry Weight Arsenic	5.5	6.7	7.5	6.0	7.3
Barium Cadmium Chromium, Total Chromium, Hexavalent Copper Lead Mercury Nickel Selenium Silver Cyanide, Total	47 4.7 15 ∠ 0.059 9.9 ∠ 2.1 0.043 19 ∠ 0.47 ∠ 2.2 ∠ 0.48	23 ∠1.3 9.3 0.065 13 ∠2.1 0.042 8.9 ∠0.45 ∠2.2 ∠0.49	40 ∠1.5 49 0.23 30 0.049 54 ∠0.47 ∠2.0 ∠0.48	5.0 1.3 3.4 0.13 9.7 2.1 0.042 4.2 4.2 4.2 4.2 4.2 4.2 -	45 ∠1.5 640 0.033 74 9.8 0.049 400 ∠0.41 3.4 ∠0.49

cc: Pratt & Whitney Att: Scott Singer Xauten I. I enul

ENVIRONMENTAL LABORATORY INC

Lawton S. Averill, Director

CT Public Health Lab No. PH-0513

REPORT ON LABORATORY EXAMINATIONS

To Client:

Pratt & Whitney

East Hartford, Ct. 06108

Date: December 15, 1989

SAMPLE DATA:

Collected By:

SAMPLE NO.	DESCRIPTION OF SAMPLE
	Concrete sample collected and received 12/7/89 from Pratt & Whitney, East Hartford, Ct., for hazardous waste incinerator closure plan analysis.
289-26-2678 289-26-2679 289-26-2680 289-26-2681 289-26-2682	IT Sample #CS-1 IT Sample #CS-2 IT Sample #CS-3 IT Sample #CS-4 IT Sample #CS-5
	DATE ANALYZED: 12/12/89

LABORATORY FINDINGS:

Parts per billion, ppb ND ∠2.5 ppb

		SAMPLE NO.				
ANALYSIS FOR	289-26-2678	289-26-2679	289-26-2680	289-26-2681	289-26-2682	
Methylene Chloride	5.4	7.4	1.8	4.7	8.8	
1,1-Dichloroethene	2.1	4.8	6.4	6.8	ND	
1,1,1-Trichloroethane	22	96	130	31	ND	
Carbon Tetrachloride	ND	ND	ND	ND	ND	
Trichloroethene	2.1	ND	ND	DN	ND	
Tetrachloroethene	280	4 60	530	310	17	
		·				
				Ω /		

cc: Pratt & Whitney

Attn: Scott Singer

The Averill Environmental Laborators Inc.

ENVIRONMENTAL LABORATORY INC

Lawton S. Averill, Director

CT Public Health Lab No. PH-0513

REPORT ON LABORATORY EXAMINATIONS

To Client:

Pratt & Whitney

East Hartford, Ct. 06108

Date: December 15, 1989

SAMPLE DATA:

Collected By:

IT Corp.

Jacques Hill

SAMPLE NO.	DESCRIPTION OF SAMPLE		
	Concrete chip samples collected and received 12/7/89 from Pratt & Whitney, East Hartford, Ct., for hazardous waste incinerator closure plan analysis.		
289-26-2679E 289-26-2680E 289-26-2681E	IT Sample No. J2196, CS-1 *EP Toxicity Elutriation IT Sample No. J2197, CS-2 *EP Toxicity Elutriation IT Sample No. J2198, CS-3 *EP Toxicity Elutriation IT Sample No. J2199, CS-4 *EP Toxicity Elutriation IT Sample No. J2200, CS-5 *EP Toxicity Elutriation		

LABORATORY FINDINGS:

(milligrams per liter, mg/l, except as noted)

VEIC 500		SAMPLE NO.			
ANALYSIS FOR	289-26-2678	289 -26-2679E	289-26-2680E	289-26-2681E	289-26-2682E
ml. 0.5N acetic acid	400	400	400	400	400
pH of filtrate	4.8	4.8	4.8	4.8	4.8
Tests are mg/l in filtrate					
Arsenic Barium Cadmium Chromium, Total Lead Mercury Selenium Silver	∠ 0.01 0.30 ∠ 0.03 0.06 ∠ 0.05 ∠ 0.001 ∠ 0.01 ∠ 0.05	∠ 0.01 0.16 ∠ 0.03 0.06 ∠ 0.05 ∠ 0.001 ∠ 0.01 ∠ 0.05	∠ 0.01 0.26 0.04 0.07 ∠ 0.05 ∠ 0.001 ∠ 0.01 ∠ 0.05	∠ 0.01 0.22 ∠ 0.03 0.06 ∠ 0.05 ∠ 0.001 ∠ 0.01 ∠ 0.05	∠ 0.01 0.31 ∠ 0.03 ∠ 0.05 ∠ 0.05 ∠ 0.001 ∠ 0.01 ∠ 0.05
*EP Toxicity Elutriation: 1	On grams of	amnle mived	with the de	signated amo	unt of 0.5

*EP loxicity Elutriation:

adetic acid, diluted to 2000 ml. with distilled water, mixed for 24 hours, settled and filtered through 0.45 micron filter paper. Filtrate was tested.

cc: Pratt & Whitney
Attn: Scott Singer

The Averill Environmental Laboratory Inc.

100 Northwest Drive Plainville, CT 06062

(203) 747-0676 FAX (203) 747-9264

Lawton S. Averill, Director

CT Public Health Lab No. PH-0513

REPORT ON LABORATORY EXAMINATIONS

To Client:

Pratt & Whitney

East Hartford, CT 06108

Date: December 18, 1989

SAMPLE DATA:

Collected By: Jacques Hill, IT Corp.

SAMPLE NO.	DESCRIPTION OF SAMPLE		
	Concrete chip samples collected and received 12-7-89 from Pratt & Whitney, East Hartford, CT for hazardous waste incinerator closure plan analysis.		
289-26-2683	IT Sample No. J 2201, CS-6		

LABORATORY FINDINGS:

(milligrams per liter, mg/l, except as noted)

1111 1515 500		SAMPLE NO.
ANALYSIS FOR	289-26-2683	
pH, 10% Slurry Total Solids, percent	11.1 99.1	
Tests are mg/kg, (ppm), based on Dry Weight Arsenic Barium Cadmium Chromium, Total Chromium, Hexavalent Copper Lead Mercury Nickel Selenium Silver Cyanide, Total Cyanide, Amenable	8.6 19 ∠1.5 3.4 0.12 10 4.4 ∠0.049 ∠4.9 ∠0.49 ∠2.4 ∠0.50	

cc: Pratt & Whitney Att: Scott Singer

ENVIRONMENTAL LABORATORY INC

Lawton S. Averill, Director

CT Public Health Lab No. PH-0513

REPORT ON LABORATORY EXAMINATIONS

To Client:

Pratt & Whitney

East Hartford, Ct. 06108

Date: December 15, 1989

SAMPLE DATA:

Collected By:

SAMPLE NO.	DESCRIPTION OF SAMPLE		
	Concrete sample collected and received 12/7/89 from Pratt & Whitney, East Hartford, Ct., for hazardous waste incinerator closure plan analysis.		
289-26-2683	IT Sample #CS-6		
	DATE ANALYZED: 12/12/89		

LABORATORY FINDINGS:

parts per billion, ppb ND /_2.5 ppb

		SAMPLE NO.	
ANALYSIS FOR	289-26-2683		
Methylene Chloride	5.2		
1,1-Dichloroethene	ND		
1,1,1-Trichloroethane	18		
Carbon Tetrachloride	ND		
Trichloroethene	ND		
Tetrachloroethene	300		
			\bigcap

cc: Pratt & Whitney Attn: Scott Singer Xanten Junell

100 Northwest Drive Plainville, CT 06062

(203) 747-0676 FAX (203) 747-9264 ENTAL LA

Lawton S. Averill, Director

CT Public Health Lab No. PH-0513

REPORT ON LABORATORY EXAMINATIONS

To Client:

Pratt & Whitney

East Hartford, Ct. 06108

Date: December 15, 1989

SAMPLE DATA:

Collected By:

IT Corp.

Jacques Hill

SAMPLE NO.	DESCRIPTION OF SAMPLE
	Concrete chip sample collected and received 12/7/89 from Pratt & Whitney, East Hartford, Ct. for hazardous waste incinerator closure plan analysis.
289-26-2683 (E)	IT Sample No. J2201, CS-6 *EP Toxicity Elutriation

LABORATORY FINDINGS:

(milligrams per liter, mg/l, except as noted)

ANALYSIS FOR	SAMPLE NO.				
	289-26- 2683E				
ml. 0.5N acetic acid	400				
pH of filtrate	4.8				
Tests are mg/l in filtrate					
Arsenic Barium Cadmium Chromium, total Lead Mercury Selenium Silver	∠ 0.01 0.21 ∠ 0.03 0.05 ∠ 0.05 ∠ 0.001 ∠ 0.01 ∠ 0.05		-		
*EP Toxicity Elutriation: 1	00 grams of sam	nple mixed w	rith the de	signated amo distilled w	unt of 0.5N ater, mixed

Filtrate was tested.

paper.

Pratt & Whitney Attn: Scott Singer

for 24 hours, settled, and filtered through 0.45 micron filter

APPENDIX N

Validation Report

QA/QC REVIEW OF AVERILL ENVIRONMENTAL LABORATORY DATA FOR WASTE FEED LINE RESULTS (ROUND II)

METALS

- Holding Times: Samples were prepared and analyzed within 40 CFR 136 holding times.
- Initial and Continuing Calibration Verification: Arsenic (82%) had a percent recovery outside control limits (90-110%). Arsenic results should be considered estimates.
- <u>Blanks</u>: Calibration and preparation blanks contained traces of chromium (0.01 mg/L), copper (0.003 mg/L), lead (0.02 mg/L) and zinc (0.003 mg/L). Results for these metals less than five times the blank level should not be reported.
- <u>Duplciates</u>: All duplicate analyses were within control limits.
- Spike Sample Recovery: All percent recoveries were within control limits.

VOLATILES BY 8010

- Holding Times: Samples were analyzed within 40 CFR 136 holding times.
- <u>Initial Calibration</u>: All percent relative standard deviation (% RSD's) were within control limits (less than 20%).
- Continuing Calibration: All percent differences (% D's) were within control limits (less than 15%).
- Blanks: The trip blank (travel blank) reported all target compounds as non-detected. Method blanks Run #800 (4.7 μg/L) and Run #808 (0.51 μg/L) contained 1,1,1-trichloroethane. No results less than five times the blank level should be reported in associated samples.
- Surrogate Recoveries: Percent recoveries were within control limits established by Method 8010, SW-846.
- <u>Matrix Spike and Duplicate</u>: Relative percent differences and percent recoveries were all within control limits.

QA/QC REVIEW OF AVERILL ENVIRONMENTAL LABORATORY DATA FOR CEILING WIPE SAMPLE RESULTS

METALS

- Holding Times: All samples were prepared and anlayzed within the required holding times.
- Initial and Continuing Calibration Verification: Arsenic (82%) had a percent recovery outside control limits. Results for arsenic should be considered estimates.
- Blanks: Calibration and preparation blanks contained traces of chromium (0.01 mg/L), copper (0.003 mg/L), lead (0.02 mg/L), and zinc (0.003 mg/L). The field blank contained traces of arsenic (9.5 μg/100 cm²). The filter blank contained traces of cadmium (3.5 μg/100 cm²), lead (10 μg/100 cm²), and arsenic (9.2 μg/100 cm²). Results for chromium (25 μg/100 cm²), arsenic (47.5 μg/100 cm²), cadmium (45 μg/100 cm²), and lead (130 μg/100 cm²), below these levels, should be rejected. Also, all results for barium should be rejected.

VOLATILES BY 8010

- Holding Times: All samples were analyzed within the required holding times.
- <u>Initial Calibration</u>: All percent relative standard deviations (% RSD's) were within control limits (less than 20%).
- Continuing Calibration: 1,1,1-Trichloroethane (12/12/89--day sample), methylene chloride (12/12/89--night sample), and 1,1,1-trichloroethane (12/13/89--day sample) each had percent differences greater than 15%. Results for these compounds in associated samples should be considered estimates.
- Blanks: The field blank contained traces of methylene chloride (0.49 μg/100 cm²), 1,1,1-trichloroethane (0.66 μg/100 cm²), and tetrachloroethene (0.21 μg/100 cm²). The wipe blanks reported all target compounds as non-detect. Results for methylene chloride (4.9 μg/100 cm²), 1,1,1-trichloroethane (3.3 μg/100 cm²), and tetrachloroethene (1.05 μg/100 cm²), below these levels, should be rejected.
- <u>Surrogate Recoveries</u>: Samples CW-4 and CW-5 had one of three percent recoveries outside control limits. No action will be taken for just one out.
- <u>Matrix Spike and Duplicate</u>: All percent recoveries were within control limits.

 Two out of six relative percent differences were outside control limits. No action is taken.

QA/QC REVIEW OF AVERILL ENVIRONMENTAL LABORATORY DATA FOR CONCRETE CHIP SAMPLE RESULTS

METALS

- Holding Times: Samples were analyzed and prepared within appropriate holding times.
- Initial and Continuing Calibration Verification: Arsenic (82%) had a percent recovery outside control limits. Arsenic results should be considered estimates.
- Blanks: The lab blank and method blank reported all target compounds as non-detect. Calibration and preparation blanks contained traces of chromium (0.01 mg/L), copper (0.003 mg/L), lead (0.02 mg/L) and zinc (0.003 mg/L). Results less than five times the blank level should not be reported in associated samples.
- <u>Duplicates</u>: Chromium (39%) for total metal anlayses had a relative percent deviation (RPD) outside control limits (0-35%). Results for chromium in total metals analyses should be considered estimates.
- Spike Sample Recovery: No spike samples were analyzed.

VOLATILES BY 8010

- Holding Times: Samples were analyzed within the appropriate holding times.
- <u>Initial Calibration</u>: All percent relative standard deviations (% RSD's) were within control limits (less than 20%).
- Continuing Calibration: All percent differences (% D's) were within control limits (less than 15%).
- Blank: The method blank reported all target compounds as non-detected.
- <u>Surrogate Recoveries</u>: IT sample numbers CS-1 and CS-4 had one of three surrogate recoveries outside control limits. No action will be taken on one of three surrogates outside control limits.
- Matrix Spike and Duplicate: One of three percent recoveries and one of six relative percent differences were outside control limits. This data in conjunction with surrogate data, indicate a matrix interference, but is not critical in higher concentrations of analyte.